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12 *Attorneys for Defendants TVPX Aircraft Solutions, Inc.*
 13 *and TVPX 2017 MSN 5043 Business Trust*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 CHRISTOPHER G. MEHNE, as Personal
 17 Representative of the Estate of MANUEL
 18 ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
 19 deceased; ANA MARÍA GONZÁLEZ-GÓMEZ, as
 20 HEIR to the Decedent, MANUEL ALEJANDRO
 21 SEPÚLVEDA-GONZÁLEZ, deceased; MANUEL
 22 SEPÚLVEDA-CRUZ, as HEIR to the Decedent,
 23 MANUEL ALEJANDRO SEPÚLVEDA-
 24 GONZÁLEZ, deceased; CHRISTOPHER G.
 25 MEHNE, as Personal Representative of the Estate
 26 of MÓNICA LETICIA SALINAS-TREVIÑO,
 27 deceased; JUAN JOSÉ SALINAS ALMAGUER,
 28 as HEIR to the Decedent, MÓNICA LETICIA
 8816 Spanish Ridge Avenue
 Las Vegas, NV 89148
 702.629.3300

CASE NO.:

NOTICE OF REMOVAL

1 SARA ALEJANDRA REYES-LUNA, as HEIR to
 the Decedent, LUIS OCTAVIO REYES-
 DOMÍNGUEZ, deceased; VICTORIA REYES-
 CISNEROS, as HEIR to the Decedent, LUIS
 OCTAVIO REYES-DOMÍNGUEZ, deceased;
 2 CHRISTOPHER G. MEHNE, as Personal
 Representative of the Estate of LOYDA LILIANA
 LUNA-LARROSA, deceased; MARÍA DEL
 PILAR LARROSA-DELGADO, as HEIR to the
 Decedent, LOYDA LILIANA LUNA-LARROSA,
 deceased; CHRISTOPHER G. MEHNE, as
 3 Personal Representative of the Estate of JADE
 PAOLA-REYES-LUNA, deceased; ALYANNA
 CAROLINA REYES-CISNEROS, as HEIR to the
 Decedent, JADE PAOLA REYES-LUNA,
 deceased; SARA ALEJANDRA REYES-LUNA, as
 4 HEIR to the Decedent, JADE PAOLA REYES-
 LUNA, deceased; VICTORIA REYES-
 CISNEROS, as HEIR to the Decedent, JADE
 PAOLA REYES-LUNA, deceased;
 5 CHRISTOPHER G. MEHNE, as Personal
 Representative of the Estate of GUILLERMO
 OCTAVIO REYES-LUNA, deceased; ALYANNA
 CAROLINA REYES-CISNEROS, as HEIR to the
 Decedent GUILLERMO OCTAVIO REYES-
 LUNA, deceased; SARA ALEJANDRA REYES-
 LUNA, as HEIR to the Decedent, GUILLERMO
 OCTAVIO REYES-LUNA, deceased; VICTORIA
 REYES-CISNEROS, as HEIR to the Decedent,
 GUILLERMO OCTAVIO REYES-LUNA,
 deceased; and CHRISTOPHER G. MEHNE, as
 6 Personal Representative of the Estate of FRIDA
 ALEJANDRINA REYES-LUNA, deceased;
 ALYANNA CAROLINA REYES-CISNEROS, as
 7 HEIR to the Decedent, FRIDA ALEJANDRINA
 REYES-LUNA, deceased; SARA ALEJANDRA
 REYES-LUNA, as HEIR to the Decedent, FRIDA
 ALEJANDRINA REYES-LUNA, deceased;
 VICTORIA REYES-CISNEROS, as HEIR to the
 Decedent, FRIDA ALEJANDRINA REYES-
 LUNA;
 8 Plaintiffs,

9 v.
 10

11 TVPX AIRCRAFT SOLUTIONS, INC.;
 12 COMPAÑÍA DE AVIACIÓN Y LOGISTICA
 13 EMPRESARIAL S.A. DE C.V.; TVPX 2017 MSN
 14 5043 BUSINESS TRUST; ATLANTIC
 15 AVIATION FBO, INC., and NABOR BONILLA
 16 CALDERA,
 17

Defendants.

TO: THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

1 Defendants TVPX AIRCRAFT SOLUTIONS, INC. (“TVPX”); TVPX 2017 MSN 5043
2 BUSINESS TRUST (“TVPX Trust”); and ATLANTIC AVIATION FBO, INC. (“Atlantic”)
3 (collectively “Defendants”) hereby notice the removal of this action to the United States District
4 Court, and, in support thereof, state as follows:

5 1. Defendants are the defendants in the above-entitled action commenced in the
6 Eighth Judicial District Court, in and for Clark County, Nevada, as Case No. A-21-833999-C, and
7 now pending in that court (“State Court Action”).

8 2. Plaintiffs commenced the State Court Action by filing a complaint (“Complaint”)
9 on May 4, 2021.

10 3. Service of the Complaint upon Defendant TVPX AIRCRAFT SOLUTIONS, INC.,
11 occurred on May 17, 2021. Service of the Complaint upon Defendant TVPX 2017 MSN 5043
12 BUSINESS TRUST occurred on May 17, 2021. Service of the Complaint upon Defendant
13 ATLANTIC AVIATION FBO, INC., occurred on May 13, 2021. Defendants COMPANIA DE
14 AVIACION Y LOGISTICA EMPRESARIAL S.A. DE C.V. or NABOR BONILLA CALDERA
15 have not yet been served.

16 4. All properly joined and served Defendants consent to removal.

17 5. The Complaint stems from a private jet crash that occurred on a May 5, 2019 flight
18 from Las Vegas, Nevada to Monterrey Mexico. After taking off from Las Vegas, Nevada, the
19 private jet with 13 passengers, including the two pilots, crashed in the State of Coahuila, Mexico,
20 killing all 13 people on board.

21 6. This Complaint was filed on behalf of eight of the deceased passengers from the
22 May 5, 2019 flight. Plaintiffs’ Complaint alleges fifteen total causes of action, comprising of
23 claims for (1) negligence, (2) gross negligence, and (3) wrongful death individually against each
24 of the five separate Defendants. It also requests punitive damages under each claim.

25 7. Plaintiffs pray for relief for special damages in excess of \$15,000; general
26 damages in excess of \$15,000; pecuniary damages in excess of \$15,000; penalty damages in
27 excess of \$15,000; compensatory damages on behalf of Plaintiff Decedents in excess of \$15,000;

damages for pain and suffering in excess of \$15,000; damages for wrongful death in excess of \$15,000; any other enumerated damages within NRS § 41.085 in excess of \$15,000; and attorneys' fees and costs according to proof.

8. No further proceedings have been had in this matter in the Eighth Judicial District Court.

9. Thirty days have not elapsed since Defendants were served with the Complaint in this action.

DIVERSITY OF CITIZENSHIP

10. This Court has original jurisdiction pursuant to 28 U.S.C. § 1332(a) and this action may be removed to this Court by Defendants pursuant to 28 U.S.C. § 1441(a) and (b) in that it is a civil action between citizens of different states or countries and the matter in controversy exceeds the sum of \$75,000 for each plaintiff, exclusive of interests and costs.

11. Defendant TVPX AIRCRAFT SOLUTIONS, INC., is incorporated in the State of Utah, with its principal place of business in the State of Utah.

12. Defendant TVPX 2017 MSN 5043 BUSINESS TRUST is a business trust established and registered in the State of Utah

13. Defendant ATLANTIC AVIATION FBO, INC., is incorporated in the State of Delaware with its principal place of business in the State of Texas.

14 Plaintiffs are listed in the Complaint as residents of the Country of Mexico.

15. Based on information and belief, there is now and there was at the time of the commencement of this action complete diversity between Plaintiffs and Defendants.

16. The sum of the damages alleged by Plaintiffs necessarily exceeds \$75,000 for each plaintiff, exclusive of interest and costs.¹ Specifically, Plaintiffs are seeking damages from a fatal

¹ Defendants note that they are not required to, nor do they, concede that Plaintiffs are entitled to recover more than \$75,000. See *Kelderman v. Remington Arms Co.*, 734 F.Supp 1527, 1528 (S.D. Iowa 1990) (rejecting a plaintiff's attempt to "place [a] defendant in the awkward position of embracing a concession on the important issue of damages," to establish jurisdiction, noting that a "defendant need not go that far"). Indeed, Defendants specifically deny that Plaintiffs are entitled to recover *any* damages.

plane crash and are seeking punitive damages. “Punitive damages may be considered in determining the requisite jurisdictional amount.” *Woodman of the World Life Ins. Soc’y v. Manganaro*, 342 F.3d 1213, 1218 (10th Cir. 2003).

17. Based on the above, adequate grounds exist to remove the Complaint to this Court based on diversity of citizenship pursuant to 28 U.S.C. § 1332(a).

FILING OF SERVICE AND REMOVAL OF DOCUMENTS

18. A copy of the Complaint is attached hereto as Exhibit A.

19. A copy of the Plaintiffs' Initial Appearance Fee Disclosure is attached hereto as Exhibit B.

20. A copy of the docket sheet is attached as Exhibit C.

21. True and correct copies of the service upon Defendants TVPX Aircraft Solutions, Inc., TVPX 2017 MSN 5043 Business Trust, and Atlantic Aviation are attached hereto as Exhibit D.

22. Other than the documents attached as Exhibits A-D, no pleadings, process, orders, or other documents in the case have been served or otherwise received by Defendants or, to Defendants' knowledge, are presently on file in the State Court. In the event that such filings come to Defendants' attention, true and legible copies will immediately be filed with this Court.

23. Defendants are serving written notification on Plaintiffs' counsel. Defendants are also filing a Notification of Removal, attaching a copy of this Notice of Removal with the Clerk of the Eighth Judicial District Court, in and for Clark County, Nevada, as Case No. A-21-833999-C, to this Court. A true and correct copy of this Notification of Removal with the Eighth Judicial District Court of Nevada is attached hereto as Exhibit E.

24. Based on the foregoing, Defendants remove the above-entitled action now pending in the Eighth Judicial District Court, in and for Clark County, Nevada, as Case No. A-21-833999-C, to this Court.

11

11

1 DATED this 4th day of June, 2021.
2
3

HYMANSON & HYMANSON

4 BY: /s/ Philip M. Hymanson
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16 *Attorneys for Defendants TVPX Aircraft Solutions,
17 Inc. and TVPX 2017 MSN 5043 Business Trust*

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CERTIFICATE OF SERVICE

Pursuant to Fed.R.Civ.P.5(b), and Section IV of District of Nevada Electronic Filing Procedures, I HEREBY CERTIFY that I am an employee of HYMANSON & HYMANSON, and I caused a true and correct copy of the foregoing **NOTICE OF REMOVAL** to be served via electronic service, via CM/ECF, on the 4th day of June, 2021, to the following:

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Attorneys for Plaintiffs

Attorneys for Plaintiffs

/s/ Karen Wiehl
an employee of Hymanson & Hymanson

EXHIBIT “A”

EXHIBIT “A”

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 18

19 DISTRICT COURT
 CLARK COUNTY, NEVADA

20 CHRISTOPHER G. MEHNE, as Personal
 Representative of the Estate of MANUEL
 ALEJANDRO SEPÚLVEDA-
 22 GONZÁLEZ, deceased; ANA MARÍA
 GONZÁLEZ-GÓMEZ, as HEIR to the
 23 Decedent. MANUEL ALEJANDRO
 SEPÚLVEDA-GONZÁLEZ, deceased;
 24 MANUEL SEPÚLVEDA-CRUZ, as HEIR
 to the Decedent MANUEL ALEJANDRO
 25 SEPÚLVEDA-GONZÁLEZ, deceased;
 26 CHRISTOPHER G. MEHNE, as Personal
 Representative of the Estate of MÓNICA
 LETICIA SALINAS-TREVINO, deceased;
 27 JUAN JOSE SALINAS ALMAGUER, as
 28 HEIR to the Decedent. MÓNICA

CASE NO. _____

DEPT. NO. _____

COMPLAINT

PLAINTIFFS DEMAND TRIAL
 BY JURY

1 LETICIA SALINAS-TREVIÑO, deceased;
2 LETICIA GUADALUPE TREVIÑO
3 VILLAREAL, as HEIR to the Decedent.
4 MÓNICA LETICIA SALINAS-TREVIÑO,
5 deceased;
6 CHRISTOPHER G. MEHNE, as Personal
7 Representative of the Estate of
8 ADRIANA MONSERRAT MEJÍA-
9 SÁNCHEZ, deceased; MARÍA
10 FERNANDA INIESTRA-MEJÍA, as
11 HEIR to the Decedent. ADRIANA
12 MONSERRAT MEJÍA-SÁNCHEZ,
13 deceased; BLANCA JANET MEJÍA-
14 SÁNCHEZ, as HEIR to the Decedent,
15 ADRIANA MONSERRAT MEJÍA-
16 SÁNCHEZ, deceased; PEDRO GABRIEL
17 INIESTRA-GALLARDO, as HEIR to the
18 Decedent. ADRIANA MONSERRAT
19 MEJÍA-SÁNCHEZ, deceased;
20 CHRISTOPHER G. MEHNE, as Personal
21 Representative of the Estate of LUIS
22 OCTAVIO REYES-DOMÍNGUEZ,
23 deceased; ALYANNA CAROLINA
24 REYES-CISNEROS, as HEIR to the
25 Decedent. LUIS OCTAVIO REYES-
26 DOMÍNGUEZ, deceased; SARA
27 ALEJANDRA REYES-LUNA, as HEIR to
28 the Decedent. LUIS OCTAVIO REYES-
 DOMÍNGUEZ, deceased; VICTORIA
 REYES-CISNEROS, as HEIR to the
 Decedent. LUIS OCTAVIO REYES-
 DOMÍNGUEZ, deceased;
 CHRISTOPHER G. MEHNE, as Personal
 Representative of the Estate of LOYDA
 LILIANA LUNA-LARROSA, deceased;
 MARÍA DEL PILAR LARROSA-
 DELGADO, as HEIR to the Decedent,
 LOYDA LILIANA LUNA-LARROSA,
 deceased;
 CHRISTOPHER G. MEHNE, as Personal
 Representative of the Estate of JADE
 PAOLA REYES-LUNA, deceased;
 ALYANNA CAROLINA REYES-
 CISNEROS, as HEIR to the Decedent.
 JADE PAOLA REYES-LUNA, deceased;
 SARA ALEJANDRA REYES-LUNA, as
 HEIR to the Decedent. JADE PAOLA
 REYES-LUNA, deceased; VICTORIA
 REYES-CISNEROS, as HEIR to the
 Decedent, JADE PAOLA REYES-LUNA,
 deceased;

1 CHRISTOPHER G. MEHNE, as Personal
2 Representative of the Estate of
3 GUILLERMO OCTAVIO REYES-LUNA,
4 deceased; ALYANNA CAROLINA
5 REYES-CISNEROS, as HEIR to the
6 Decedent. GUILLERMO OCTAVIO
7 REYES-LUNA, deceased; SARA
8 ALEJANDRA REYES-LUNA, as HEIR to
9 the Decedent. GUILLERMO OCTAVIO
10 REYES-LUNA, deceased; VICTORIA
11 REYES-CISNEROS, as HEIR to the
12 Decedent. GUILLERMO OCTAVIO
13 REYES-LUNA, deceased; and

14 CHRISTOPHER G. MEHNE, as Personal
15 Representative of the Estate of FRIDA
16 ALEJANDRINA REYES-LUNA,
17 deceased; ALYANNA CAROLINA
18 REYES-CISNEROS, as HEIR to the
19 Decedent. FRIDA ALEJANDRINA
20 REYES-LUNA, deceased; SARA
21 ALEJANDRA REYES-LUNA, as HEIR to
22 the Decedent. FRIDA ALEJANDRINA
23 REYES-LUNA, deceased; VICTORIA
24 REYES-CISNEROS, as HEIR to the
25 Decedent. FRIDA ALEJANDRINA
26 REYES-LUNA, deceased;

27 Plaintiffs,

28 vs.

1 TVPX AIRCRAFT SOLUTIONS, INC.;
2 COMPAÑÍA DE AVIACIÓN Y
3 LOGISTICA EMPRESARIAL S.A. DE
4 C.V.; TVPX 2017 MSN 5043 BUSINESS
5 TRUST; ATLANTIC AVIATION FBO,
6 INC., and NABOR BONILLA CALDERA

7 Defendants.

8 NOW COME Plaintiffs, CHRISTOPHER G. MEHNE, as Personal
9 Representative of the Estate of MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
10 deceased; ANA MARÍA GONZÁLEZ-GÓMEZ, as HEIR to the Decedent, MANUEL
11 ALEJANDRO SEPÚLVEDA-GONZÁLEZ, deceased; MANUEL SEPÚLVEDA-CRUZ,
12 as HEIR to the Decedent, MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,

1 deceased; CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of
2 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; JUAN JOSÉ SALINAS
3 ALMAGUER, as HEIR to the Decedent, MÓNICA LETICIA SALINAS-TREVIÑO,
4 deceased; LETICIA GUADALUPE TREVIÑO VILLAREAL, as HEIR to the Decedent,
5 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; CHRISTOPHER G. MEHNE, as
6 Personal Representative to the Estate of ADRIANA MONSERRAT MEJÍA-
7 SÁNCHEZ, deceased; MARÍA FERNANDA INIESTRA-MEJÍA, as HEIR to the
8 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; BLANCA JANET
9 MEJÍA-SÁNCHEZ, as HEIR to the Decedent, ADRIANA MONSERRAT MEJÍA-
10 SÁNCHEZ, deceased; PEDRO GABRIEL INIESTRA-GALLARDO, as HEIR to the
11 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; CHRISTOPHER
12 G. MEHNE, as Personal Representative of the Estate of LUIS OCTAVIO REYES-
13 DOMÍNGUEZ, deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to
14 the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ, deceased; SARA ALEJANDRA
15 REYES-LUNA, as HEIR to the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ,
16 deceased; VICTORIA REYES-CISNEROS, as HEIR to the Decedent, LUIS OCTAVIO
17 REYES-DOMÍNGUEZ, deceased; CHRISTOPHER G. MEHNE, as Personal
18 Representative of the Estate of LOYDA LILIANA LUNA-LARROSA, deceased;
19 MARÍA DEL PILAR LARROSA-DELGADO, as HEIR to the Decedent, LOYDA
20 LILIANA LUNA-LARROSA, deceased; CHRISTOPHER G. MEHNE, as Personal
21 Representative of the Estate of JADE PAOLA-REYES-LUNA, deceased; ALYANNA
22 CAROLINA REYES-CISNEROS, as HEIR to the Decedent, JADE PAOLA REYES-
23 LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent,
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1 JADE PAOLA REYES-LUNA, deceased; VICTORIA REYES-CISNEROS, as HEIR to
2 the Decedent, JADE PAOLA REYES-LUNA, deceased; CHRISTOPHER G. MEHNE,
3 as Personal Representative of the Estate of GUILLERMO OCTAVIO REYES-LUNA,
4 deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent
5 GUILLERMO OCTAVIO REYES-LUNA, deceased; SARA ALEJANDRA REYES-
6 LUNA, as HEIR to the Decedent, GUILLERMO OCTAVIO REYES-LUNA, deceased;
7 VICTORIA REYES-CISNEROS, as HEIR to the Decedent, GUILLERMO OCTAVIO
8 REYES-LUNA, deceased; and CHRISTOPHER G. MEHNE, as Personal
9 Representative of the Estate of FRIDA ALEJANDRINA REYES-LUNA, deceased;
10 ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent, FRIDA
11 ALEJANDRINA REYES-LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as
12 HEIR to the Decedent, FRIDA ALEJANDRINA REYES-LUNA, deceased; VICTORIA
13 REYES-CISNEROS, as HEIR to the Decedent, FRIDA ALEJANDRINA REYES-
14 LUNA, deceased; and each of them, by and through their undersigned counsel of
15 record, for their claims of relief against Defendants, TVPX AIRCRAFT SOLUTIONS,
16 INC., COMPAÑÍA DE AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V.,
17 TVPX 2017 MSN 5043 BUSINESS TRUST, ATLANTIC AVIATION FBO, INC., and
18 NABOR BONILLA CALDERA, and each of them, hereby allege and complain, on
19 information and belief, as follows:

20 **GENERAL/JURISDICTIONAL ALLEGATIONS**

21 1. This is a civil action for damages arising from wrongful death and pre-
22 death injuries suffered by the Plaintiff Decedents, and each of them, arising from a
23 private jet crash that occurred on a flight from Las Vegas, Nevada to Monterrey,
24

1 Mexico on May 5, 2019, that killed all thirteen people on board, including the two
2 pilots.

3 2. On May 5, 2019, and at all times herein relevant, the Defendant, TVPX
4 AIRCRAFT SOLUTIONS, INC., was and continues to be a corporation organized and
5 existing under the laws of the State of Utah, with its principal place of business at 39
6 East Eagle Ridge Drive, North Salt Lake, Utah, which conducted substantial
7 business in the State of Nevada, including certain business from which this action
8 arises.

9 3. On May 5, 2019, and at all times herein relevant, the Defendant,
10 COMPAÑÍA DE AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V., was and
11 continues to be a legal entity organized and existing under the laws of the Country of
12 Mexico with its principal place of business in the Country of Mexico, with address at
13 Antonio Dovalí Jaime No. 70, Torre B, Piso 13, Col. Zedec Santa Fe, Álvaro Obregón,
14 C.P. 01210, Ciudad de México, which conducted substantial business in the State of
15 Nevada, including certain business from which this action arises.

16 4. On May 5, 2019, and at all times herein relevant, the Defendant, TVPX
17 2017 MSN 5043 BUSINESS TRUST, was a business trust that was first established
18 and registered with the Utah Division of Corporations and Commercial Code on
19 October 5, 2017, and which individually and/or through its agents or employees
20 conducted certain business in the State of Nevada from which this action arises.

21 5. On May 5, 2019, and at all times herein relevant, the trustor of the
22 Defendant, TVPX 2017 MSN 5043 BUSINESS TRUST, was and continued to be the
23 Defendant, COMPAÑÍA DE AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V.
24

1 6. On May 5, 2019, and at all times herein relevant, the Defendant,
2 ATLANTIC AVIATION FBO, INC., was and continues to be a corporation organized
3 and existing under the laws of the State of Delaware with its principal place of
4 business in the State of Texas, which individually and doing business at Atlantic
5 Aviation LAS, conducted substantial business in the State of Nevada, including
6 certain business from which this action arises.

8 7. On May 5, 2019, and at all times herein relevant, the Defendant,
9 NABOR BONILLA CALDERA, was a citizen and resident of Mexico who individually
10 and/or through his agents or employees conducted certain business in the State of
11 Nevada from which this action arises.

13 8. On May 5, 2019, and at all times relevant prior to their deaths on May 5,
14 2019, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-
15 TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-
16 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
17 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
18 LUNA, (hereinafter “Plaintiff Decedents”) and each of them, were residents and
19 citizens of Mexico.

21 9. On May 5, 2019, and at all times relevant, ANA MARÍA GONZÁLEZ-
22 GÓMEZ, MANUEL SEPÚLVEDA-CRUZ, JUAN JOSÉ SALINAS ALMAGUER,
23 LETICIA GUADALUPE TREVIÑO VILLAREAL, MARÍA FERNANDA INIESTRA-
24 MEJÍA, BLANCA JANET MEJÍA-SÁNCHEZ, PEDRO, GABRIEL INIESTRA-
25 GALLARDO, ALYANNA CAROLINA REYES-CISNEROS, SARA ALEJANDRA
26 REYES-LUNA, VICTORIA REYES-CISNEROS, MARÍA DEL PILAR LARROSA-
27
28

1 DELGADO, (hereinafter “Plaintiff Heirs), and each of them, were residents and
2 citizens of Mexico and bring this action in their representative capacities on behalf of
3 the Plaintiff Decedents, and each of them.
4

5 10. Plaintiff Personal Representative, CHRISTOPHER G. MEHNE, is an
6 attorney licensed to practice law in the Commonwealth of Massachusetts, who was
7 appointed as the Personal Representatives of the Estate of Plaintiff Decedents,
8 MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, MÓNICA LETICIA SALINAS-
9 TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-
10 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
11 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
12 LUNA, and each of them, and brings this action in his representative capacity on
13 behalf of these Estates, and each of them.
14

15 11. Plaintiff Heirs and Plaintiff Personal Representatives will hereby
16 collectively be referred to as “Plaintiffs,” unless specifically referred to otherwise.
17 Plaintiff Decedents will hereby be referred to as such.
18

19 12. Jurisdiction in the State of Nevada is properly conferred by Nev. Rev.
20 Stat. § 14.065.
21

22 13. Venue in Clark County, Nevada is properly conferred by Nev. Rev. Stat.
23 § 13.040.
24

FACTUAL ALLEGATIONS

25 14. Plaintiffs repeat and reallege each and every allegation and fact
26 contained in this Complaint and incorporate the same herein by reference as though
27 fully set forth herein.
28

1 15. In or about April 1989, Bombardier, Inc. manufactured a certain Model
2 CL-600-2B16 aircraft bearing serial number 5043 (hereinafter “Subject Aircraft”) in
3 accordance with the approved type designs under Canadian Type Certificate No. A-
4 131 and FAA Type Certificate A21EA.
5

6 16. Defendant, TVPX 2017 MSN 5043 BUSINESS TRUST, was first
7 established and registered with the Utah Division of Corporations and Commercial
8 Code on October 5, 2017. The trustor of Defendant, TVPX 2017 MSN 5043
9 BUSINESS TRUST, was and continues to be Defendant, COMPAÑÍA DE AVIACIÓN
10 Y LOGISTICA EMPRESARIAL S.A. DE C.V.
11

12 17. Within its Certificate of Registration with the Utah Division of
13 Corporations and Commercial Code on October 5, 2017, Defendant, TVPX 2017 MSN
14 5043 BUSINESS TRUST named the Defendant, TVPX AIRCRAFT SOLUTIONS,
15 INC., as its Trustee.
16

17 18. On or about October 16, 2017, Defendant, TVPX AIRCRAFT
18 SOLUTIONS, INC., as Trustee for Defendant, TVPX 2017 MSN 5043 BUSINESS
19 TRUST, purchased and took possession of the Subject Aircraft.
20

21 19. On October 16, 2017 and at the time of the purchase of the Subject
22 Aircraft by Defendant, TVPX AIRCRAFT SOLUTIONS, INC., as Trustee for
23 Defendant, TVPX 2017 MSN 5043 BUSINESS TRUST, there was in force and effect a
24 certain *Aircraft Operating Lease Agreement* related to the Subject Aircraft between
25 Defendant, TVPX AIRCRAFT SOLUTIONS, INC., as “Owner” and Defendant,
26 COMPAÑÍA DE AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V., as
27 “Operator.”
28

1 20. From October 16, 2017 through and including May 5, 2019, the aforesaid
2 *Aircraft Operating Lease Agreement* between Defendant, TVPX AIRCRAFT
3 SOLUTIONS, INC., and Defendant, COMPAÑÍA DE AVIACIÓN Y LOGISTICA
4 EMPRESARIAL S.A. DE C.V., remained in full force and effect between those
5 parties.

7 21. In addition to the aforesaid *Aircraft Operating Lease Agreement*,
8 Defendant, TVPX AIRCRAFT SOLUTIONS, INC., entered into a product and/or
9 services agreement with Defendant, COMPAÑÍA DE AVIACIÓN Y LOGISTICA
10 EMPRESARIAL S.A. DE C.V., which agreement allowed Defendant, COMPAÑÍA DE
11 AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V., to purchase products
12 and/or services necessary or desired for the continued operation, repair, and/or
13 maintenance of the Subject Aircraft through Defendant, TVPX AIRCRAFT
14 SOLUTIONS, INC., including credit cards issued to Defendant, TVPX AIRCRAFT
15 SOLUTIONS, INC. and used by Defendant, COMPAÑÍA DE AVIACIÓN Y
16 LOGISTICA EMPRESARIAL S.A. DE C.V., in its operation.

19 22. On May 5, 2019, and all times herein relevant, the Defendant, NABOR
20 BONILLA CALDERA, was a director and/or officer of the Defendant, COMPAÑÍA DE
21 AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V., who each individually and
22 in his capacity of a director and/or officer of the Defendant, COMPAÑÍA DE
23 AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V., undertook certain duties
24 relating to the aforesaid *Aircraft Operating Lease Agreement*, the operation and
25 maintenance of the Subject Aircraft, and the control, qualification, training,
26 employment and assignment of duties of pilots authorized and permitted to operate
27
28

1 the Subject Aircraft.

2 23. Upon information and belief, Defendant, TVPX AIRCRAFT
3 SOLUTIONS, INC., also procured the policy of liability insurance covering the
4 Subject Aircraft, to wit: QBE Insurance Policy No. 100003193, with a policy period of
5 August 7, 2018 through August 7, 2019 that listed the Defendant, NABOR BONILLA
6 CALDERA, as an insured, and further assisted Defendants, COMPAÑÍA DE
7 AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V. and NABOR BONILLA
8 CALDERA, in payment of flight permit fees and customs and border patrol services
9 related to the operation of the Subject Aircraft into and out of the United States of
10 America.
11

12 24. On and about May 5, 2019, Defendant, TVPX AIRCRAFT SOLUTIONS,
13 INC., paid for certain servicing and fueling of the Subject Aircraft in Las Vegas,
14 Nevada from the Defendant, ATLANTIC AVIATION FBO, INC., prior to and for the
15 purpose of conducting the accident flight from Las Vegas, Nevada to Monterrey,
16 Mexico.
17

18 25. On May 5, 2019, and all times herein relevant, Defendants, TVPX
19 AIRCRAFT SOLUTIONS, INC., COMPAÑÍA DE AVIACIÓN Y LOGISTICA
20 EMPRESARIAL S.A. DE C.V., TVPX 2017 MSN 5043 BUSINESS TRUST, and/or
21 NABOR BONILLA CALDERA, had operational control of the Subject Aircraft when
22 the injuries and deaths were sustained by the Plaintiff Decedents during the accident
23 flight as described herein.
24

25 26. Prior to May 5, 2019, Plaintiff Decedents MANUEL ALEJANDRO
26 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, LUIS OCTAVIO REYES-
27
28

1 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
2 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
3 LUNA, and each of them, had a planned roundtrip flight itinerary originating on May
4 3, 2019 from Monterrey, Mexico to Las Vegas, Nevada, and returning from Las
5 Vegas, Nevada to Monterrey, Mexico on May 5, 2019. One of the purposes of the trip
6 was to attend a professional boxing title match between Canelo Álvarez and Daniel
7 Jacobs at the T-Mobile Arena in Las Vegas, Nevada on May 4, 2019.

8
9 27. On May 5, 2019, Plaintiff Decedents, MANUEL ALEJANDRO
10 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, LUIS OCTAVIO REYES-
11 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
12 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
13 LUNA, and each of them, as passengers and Plaintiff Decedent, ADRIANA
14 MONSERRAT MEJIA-SANCHEZ, who was providing in-flight services for the
15 airplane passengers, and each of them, each boarded the Subject Aircraft, Canadair
16 Model CL-600-2B16, serial number 5043, bearing U.S. Registration N601VH at
17 McCarran International Airport in Las Vegas, Nevada for purposes of the return trip
18 to Monterrey, Mexico.

19
20 28. On May 5, 2019, the Subject Aircraft was being piloted by Juan Jose
21 Aguilar Talavera as the captain and pilot-in-command and Luis Ovidio Gonzalez
22 Flores as the first officer.

23
24 29. On May 5, 2019, and all times herein relevant, the pilots, Juan Jose
25 Aguilar Talavera and Luis Ovidio Gonzalez Flores, were the agents of the
26 Defendants, TVPX AIRCRAFT SOLUTIONS, INC., COMPAÑÍA DE AVIACIÓN Y
27
28

LOGISTICA EMPRESARIAL S.A. DE C.V., TVPX 2017 MSN 5043 BUSINESS TRUST, and/or NABOR BONILLA CALDERA, and each of them, and were acting within the scope of their aforesaid agency.

30. On May 5, 2019 and during the flight from Las Vegas Nevada to Monterrey, Mexico, the Subject Aircraft climbed to approximately 41,000 feet when it experienced a sudden loss of airspeed and shortly thereafter entered an aerodynamic stall, followed by a double engine failure and a rapid descent toward the ground, during which the pilots were unable to restart the Subject Aircraft's engines.

11 31. On May 5, 2019, and as a result of the foregoing events, the Subject
12 Aircraft violently crashed into the ground in the State of Coahuila, Mexico, causing
13 all persons aboard to suffer fatal injuries, including Plaintiff Decedents, MANUEL
14 ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
15 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
16 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
17 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them.
18

FIRST CAUSE OF ACTION
(Negligence)

32. Plaintiffs repeat and reallege each and every allegation and fact
22 contained in this Complaint and incorporate the same herein by reference.
23

24 33. On May 5, 2019, and at all times relevant, Defendant, TVPX AIRCRAFT
25 SOLUTIONS, INC., owed a duty to Plaintiff Decedents, MANUEL ALEJANDRO
26 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
27 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA

1 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
 2 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, to
 3 exercise ordinary care in the ownership, entrustment, operation, and control of the
 4 Subject Aircraft, so as not cause injury to their persons.
 5

6 34. On May 5, 2019, Defendant, TVPX AIRCRAFT SOLUTIONS, INC.,
 7 individually and/or through its agents, servants, employees, and/or licensees,
 8 including, but not limited to the pilots of the Subject Aircraft, Juan Jose Aguilar
 9 Talavera and Luis Ovidio Gonzalez Flores, and each of them, breached their duty of
 10 care to Plaintiff Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ,
 11 LETICIA SALINAS-TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS
 12 OCTAVIO REYES-DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE
 13 PAOLA REYES-LUNA, GUILLERMO OCTAVIO REYES-LUNA, and FRIDA
 14 ALEJANDRINA REYES-LUNA, and each of them, in one or more of the following
 15 particulars:
 16

- 17 a) Negligently and carelessly entrusted the Subject Aircraft, which
 18 was a dangerous instrumentality, to Defendant, COMPAÑÍA DE
 19 AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V., when it
 20 knew, or should have known, that Defendant, COMPAÑÍA DE
 21 AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V., was
 22 likely to operate it in an unsafe and dangerous manner;
- 23 b) Negligently and carelessly permitted Defendant, COMPAÑÍA DE
 24 AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V., to
 25 continue to operate the Subject Aircraft when it had actual or
 constructive notice that Defendant, COMPAÑÍA DE AVIACIÓN Y
 LOGISTICA EMPRESARIAL S.A. DE C.V., was operating the
 Subject Aircraft in an unsafe and dangerous manner;
- 26 c) Negligently and carelessly failed to provide or ensure the
 27 provision of updates and supplements to flight manuals,
 28 maintenance manuals, airworthiness directives, service bulletins,
 and other publications and information necessary for the

airworthiness and safe operation of the Subject Aircraft;

- d) Negligently and carelessly operated the Subject Aircraft with pilots who lacked proper and adequate education, training, experience, and/or skills to pilot the Subject Aircraft in a safe manner;
 - e) Negligently and carelessly failed to provide and ensure proper and adequate training and certification of pilots permitted to operate the Subject Aircraft;
 - f) Negligently and carelessly maintained the Subject Aircraft;
 - g) Negligently and carelessly failed to provide and ensure proper and adequate training and certification of mechanics permitted to perform maintenance, repair and overhaul work on the Subject Aircraft, the subject engines, and other component parts of the Subject Aircraft; and/or
 - h) It otherwise negligently and carelessly owned, entrusted, operated and/or controlled the Subject Aircraft in an unsafe and dangerous manner in particulars to be determined through discovery herein.

35. On May 5, 2019, as a direct and proximate result of the foregoing breach

of duty by Defendant, TVPX AIRCRAFT SOLUTIONS, INC., the Subject Aircraft was caused to and did experience an inflight loss of airspeed and, shortly thereafter, entered an aerodynamic stall, followed by a double engine failure and a rapid descent toward the ground, during which the pilots were unable to restart the engines, all of which further resulted in the Subject Aircraft violently crashing into the ground in the State of Coahuila, Mexico, causing all persons aboard to suffer fatal injuries, including Plaintiff Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them.

1 36. Prior to their deaths, Plaintiff Decedents, MANUEL ALEJANDRO
 2 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
 3 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
 4 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
 5 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, were
 6 in good health and would have been capable of earning income. The Plaintiff Heirs,
 7 ANA MARÍA GONZÁLEZ-GÓMEZ, MANUEL SEPÚLVEDA-CRUZ, JUAN JOSÉ
 8 SALINAS ALMAGUER, LETICIA GUADALUPE TREVIÑO VILLAREAL, MARÍA
 9 FERNANDA INIESTRA-MEJÍA, BLANCA JANET MEJÍA-SÁNCHEZ, PEDRO,
 10 GABRIEL INIESTRA-GALLARDO, ALYANNA CAROLINA REYES-CISNEROS,
 11 SARA ALEJANDRA REYES-LUNA, VICTORIA REYES-CISNEROS, MARÍA DEL
 12 PILAR LARROSA-DELGADO, and each of them, and further next of kin of Plaintiff
 13 Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-
 14 TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-
 15 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
 16 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
 17 LUNA, and each of them, are entitled to the fair monetary value of the Plaintiff
 18 Decedents, including, but not limited to, compensation for the loss of the reasonably
 19 expected net income, loss of past and future earning capacity, loss of services,
 20 protections, care, assistance, society, companionship, comfort, guidance, counsel, and
 21 advice of the Plaintiff Decedents and to the reasonable medical, funeral, and burial
 22 expenses incurred.

23 37. That, as a direct and proximate result of the negligent acts/omissions of
 24
 25
 26

1 Defendant, TVPX AIRCRAFT SOLUTIONS, INC., Plaintiffs and Plaintiff Decedents
2 incurred general and special damages in excess of fifteen thousand dollars
3 (\$15,000.00); general and compensatory damages, including, but not limited to, pre-
4 death great pain of body and mind, pre-death disfigurement, pre-death mental
5 anguish, pre-death shock and agony, pre-death terror, and loss of enjoyment of life, in
6 excess of fifteen thousand dollars (\$15,000.00); pecuniary damages in excess of fifteen
7 thousand dollars (\$15,000.00).

9
10 38. That as a direct and proximate result of the aforementioned negligence
11 of Defendant, TVPX AIRCRAFT SOLUTIONS, INC., Plaintiffs may recover penalty
12 and punitive damages that would have recovered if Plaintiff Decedents have survived
13 and that Plaintiffs have been required to engage in the services of an attorney,
14 incurring attorneys' fees and costs to bring this action.

15
16 39. WHEREFORE, Plaintiff, CHRISTOPHER G. MEHNE, as Personal
17 Representative of the Estate of MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
18 deceased; ANA MARÍA GONZÁLEZ-GÓMEZ, as HEIR to the Decedent, MANUEL
19 ALEJANDRO SEPÚLVEDA-GONZÁLEZ, deceased; MANUEL SEPÚLVEDA-CRUZ,
20 as HEIR to the Decedent, MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
21 deceased; CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of
22 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; JUAN JOSÉ SALINAS
23 ALMAGUER, as HEIR to the Decedent, MÓNICA LETICIA SALINAS-TREVIÑO,
24 deceased; LETICIA GUADALUPE TREVIÑO VILLAREAL, as HEIR to the Decedent,
25 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; CHRISTOPHER G. MEHNE, as
26 Personal Representative to the Estate of ADRIANA MONSERRAT MEJÍA-
27
28

1 SÁNCHEZ, deceased; MARÍA FERNANDA INIESTRA-MEJÍA, as HEIR to the
2 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; BLANCA JANET
3 MEJÍA-SÁNCHEZ, as HEIR to the Decedent, ADRIANA MONSERRAT MEJÍA-
4 SÁNCHEZ, deceased; PEDRO GABRIEL INIESTRA-GALLARDO, as HEIR to the
5 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; CHRISTOPHER
6 G. MEHNE, as Personal Representative of the Estate of LUIS OCTAVIO REYES-
7 DOMÍNGUEZ, deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to
8 the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ, deceased; SARA ALEJANDRA
9 REYES-LUNA, as HEIR to the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ,
10 deceased; VICTORIA REYES-CISNEROS, as HEIR to the Decedent, LUIS OCTAVIO
11 REYES-DOMÍNGUEZ, deceased; CHRISTOPHER G. MEHNE, as Personal
12 Representative of the Estate of LOYDA LILIANA LUNA-LARROSA, deceased;
13 MARÍA DEL PILAR LARROSA-DELGADO, as HEIR to the Decedent, LOYDA
14 LILIANA LUNA-LARROSA, deceased; CHRISTOPHER G. MEHNE, as Personal
15 Representative of the Estate of JADE PAOLA-REYES-LUNA, deceased; ALYANNA
16 CAROLINA REYES-CISNEROS, as HEIR to the Decedent, JADE PAOLA REYES-
17 LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent,
18 JADE PAOLA REYES-LUNA, deceased; VICTORIA REYES-CISNEROS, as HEIR to
19 the Decedent, JADE PAOLA REYES-LUNA, deceased; CHRISTOPHER G. MEHNE,
20 as Personal Representative of the Estate of GUILLERMO OCTAVIO REYES-LUNA,
21 deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent
22 GUILLERMO OCTAVIO REYES-LUNA, deceased; SARA ALEJANDRA REYES-
23 LUNA, as HEIR to the Decedent, GUILLERMO OCTAVIO REYES-LUNA, deceased;
24
25
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1 VICTORIA REYES-CISNEROS, as HEIR to the Decedent, GUILLERMO OCTAVIO
2 REYES-LUNA, deceased; and CHRISTOPHER G. MEHNE, as Personal
3 Representative of the Estate of FRIDA ALEJANDRINA REYES-LUNA, deceased;
4 ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent, FRIDA
5 ALEJANDRINA REYES-LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as
6 HEIR to the Decedent, FRIDA ALEJANDRINA REYES-LUNA, deceased; VICTORIA
7 REYES-CISNEROS, as HEIR to the Decedent, FRIDA ALEJANDRINA REYES-
8 LUNA, deceased; and each of them, and each of them, demand judgment against
9 Defendant, TVPX AIRCRAFT SOLUTIONS, INC., together with interest, costs, and
10 fees.
11

SECOND CAUSE OF ACTION

(Gross Negligence)

Plaintiffs v. TVPX Aircraft Solutions, Inc.

15 40. Plaintiffs repeat and reallege each and every allegation and fact
16 contained in this Complaint and incorporate the same herein by reference.
17

18 41. On May 5, 2019, and at all times relevant, Defendant, TVPX AIRCRAFT
19 SOLUTIONS, INC., owed a duty to Plaintiff Decedents, MANUEL ALEJANDRO
20 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
21 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
22 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
23 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, to
24 exercise ordinary care in the ownership, entrustment, operation, and control of the
25 Subject Aircraft so as not cause injury to their persons.
26

27 42. On May 5, 2019, Defendant, TVPX AIRCRAFT SOLUTIONS, INC.,
28

1 individually and/or through its agents, servants, employees, and/or licensees,
2 including, but not limited to the pilots of the Subject Aircraft, Juan Jose Aguilar
3 Talavera and Luis Ovidio Gonzalez Flores, and each of them, acted recklessly,
4 maliciously, and willfully, whereupon Defendant, TVPX AIRCRAFT SOLUTIONS,
5 INC., breached its duty of care to Plaintiff Decedents, MANUEL ALEJANDRO
6 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
7 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
8 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
9 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, in one
10 or more of the following particulars:

- 13 a) Recklessly, maliciously, and willfully entrusted the Subject
14 Aircraft, which was a dangerous instrumentality, to Defendant,
15 COMPAÑÍA DE AVIACIÓN Y LOGISTICA EMPRESARIAL S.A.
16 DE C.V., when it knew, or should have known, that Defendant,
17 COMPAÑÍA DE AVIACIÓN Y LOGISTICA EMPRESARIAL S.A.
18 DE C.V., was likely to operate it in an unsafe and dangerous
19 manner;
- 20 b) Recklessly, maliciously, and willfully permitted Defendant,
21 COMPAÑÍA DE AVIACIÓN Y LOGISTICA EMPRESARIAL S.A.
22 DE C.V., to continue to operate the Subject Aircraft when it had
23 actual or constructive notice that Defendant, COMPAÑÍA DE
24 AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V., was
25 operating the Subject Aircraft in an unsafe and dangerous
26 manner;
- 27 c) Recklessly, maliciously, and willfully failed to provide or ensure
28 the provision of updates and supplements to flight manuals,
maintenance manuals, airworthiness directives, service bulletins,
and other publications and information necessary for the
airworthiness and safe operation of the Subject Aircraft;
- 29 d) Recklessly, maliciously, and willfully operated the Subject
30 Aircraft with pilots who lacked proper and adequate education,
31 training, experience, and/or skills to pilot the Subject Aircraft in a
32 safe manner;

- 1 e) Recklessly, maliciously, and willfully failed to provide and ensure
2 proper and adequate training and certification of pilots permitted
3 to operate the Subject Aircraft;
- 4 f) Recklessly, maliciously, and willfully maintained the Subject
5 Aircraft;
- 6 g) Recklessly, maliciously, and willfully failed to provide and ensure
7 proper and adequate training and certification of mechanics
8 permitted to perform maintenance, repair and overhaul work on
9 the Subject Aircraft, the subject engines, and other component
10 parts of the Subject Aircraft; and/or
- 11 h) It otherwise recklessly, maliciously, and willfully owned,
12 entrusted, operated and/or controlled the Subject Aircraft in an
13 unsafe and dangerous manner in particulars to be determined
14 through discovery herein.

12 43. On May 5, 2019, as a direct and proximate result of the foregoing
13 reckless, malicious, and/or willful acts/omissions by Defendant, TVPX AIRCRAFT
14 SOLUTIONS, INC., the Subject Aircraft was caused to and did experience an inflight
15 loss of airspeed and shortly thereafter entered an aerodynamic stall, followed by a
16 double engine failure and a rapid descent toward the ground, during which the pilots
17 were unable to restart the engines, all of which further resulted in the Subject
18 Aircraft violently crashing into the ground in the State of Coahuila, Mexico, causing
19 all persons aboard to suffer fatal injuries, including Plaintiff Decedents, MANUEL
20 ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
21 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
22 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
23 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them.

24 44. Prior to their deaths, Plaintiff Decedents MANUEL ALEJANDRO
25 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA

1 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
2 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
3 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, were
4 in good health and would have been capable of earning income. The Plaintiff Heirs,
5 ANA MARÍA GONZÁLEZ-GÓMEZ, MANUEL SEPÚLVEDA-CRUZ, JUAN JOSÉ
6 SALINAS ALMAGUER, LETICIA GUADALUPE TREVIÑO VILLAREAL, MARÍA
7 FERNANDA INIESTRA-MEJÍA, BLANCA JANET MEJÍA-SÁNCHEZ, PEDRO,
8 GABRIEL INIESTRA-GALLARDO, ALYANNA CAROLINA REYES-CISNEROS,
9 SARA ALEJANDRA REYES-LUNA, VICTORIA REYES-CISNEROS, MARÍA DEL
10 PILAR LARROSA-DELGADO, and each of them, and further next of kin of Plaintiff
11 Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-
12 TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-
13 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
14 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
15 LUNA, and each of them, are entitled to the fair monetary value of the Plaintiff
16 Decedents, including, but not limited to, compensation for the loss of the reasonably
17 expected net income, loss of past and future earning capacity, loss of services,
18 protections, care, assistance, society, companionship, comfort, guidance, counsel, and
19 advice of the Plaintiff Decedents and to the reasonable medical, funeral, and burial
20 expenses incurred.

21 45. That, as a direct and proximate result of the reckless, malicious, and/or
22 willful acts/omissions of Defendant, TVPX AIRCRAFT SOLUTIONS, INC., Plaintiffs
23 and Plaintiff Decedents incurred general and special damages, including but not
24

1 limited to burial and funeral expenses, in excess of fifteen thousand dollars
2 (\$15,000.00); general and compensatory damages, including, but not limited to, great
3 pain of body and mind, disfigurement, mental anguish, shock and agony, pre-death
4 terror, loss of enjoyment of life, in excess of fifteen thousand dollars (\$15,000.00);
5 pecuniary damages in excess of fifteen thousand dollars (\$15,000.00).

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7 46. That as a direct and proximate result of the aforementioned reckless,
8 malicious, and/or willful acts/omissions of Defendant, TVPX AIRCRAFT
9 SOLUTIONS, INC., Plaintiffs may recover penalty and punitive damages that would
10 have recovered if Plaintiff Decedents have survived and that Plaintiffs have been
11 required to engage in the services of an attorney, incurring attorneys' fees and costs
12 to bring this action.

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14 47. WHEREFORE, Plaintiff, CHRISTOPHER G. MEHNE, as Personal
15 Representative of the Estate of MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
16 deceased; ANA MARÍA GONZÁLEZ-GÓMEZ, as HEIR to the Decedent, MANUEL
17 ALEJANDRO SEPÚLVEDA-GONZÁLEZ, deceased; MANUEL SEPÚLVEDA-CRUZ,
18 as HEIR to the Decedent, MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
19 deceased; CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of
20 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; JUAN JOSÉ SALINAS
21 ALMAGUER, as HEIR to the Decedent, MÓNICA LETICIA SALINAS-TREVIÑO,
22 deceased; LETICIA GUADALUPE TREVIÑO VILLAREAL, as HEIR to the Decedent,
23 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; CHRISTOPHER G. MEHNE, as
24 Personal Representative to the Estate of ADRIANA MONSERRAT MEJÍA-
25 SÁNCHEZ, deceased; MARÍA FERNANDA INIESTRA-MEJÍA, as HEIR to the
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1 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; BLANCA JANET
2 MEJÍA-SÁNCHEZ, as HEIR to the Decedent, ADRIANA MONSERRAT MEJÍA-
3 SÁNCHEZ, deceased; PEDRO GABRIEL INIESTRA-GALLARDO, as HEIR to the
4 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; CHRISTOPHER
5 G. MEHNE, as Personal Representative of the Estate of LUIS OCTAVIO REYES-
6 DOMÍNGUEZ, deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to
7 the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ, deceased; SARA ALEJANDRA
8 REYES-LUNA, as HEIR to the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ,
9 deceased; VICTORIA REYES-CISNEROS, as HEIR to the Decedent, LUIS OCTAVIO
10 REYES-DOMÍNGUEZ, deceased; CHRISTOPHER G. MEHNE, as Personal
11 Representative of the Estate of LOYDA LILIANA LUNA-LARROSA, deceased;
12 MARÍA DEL PILAR LARROSA-DELGADO, as HEIR to the Decedent, LOYDA
13 LILIANA LUNA-LARROSA, deceased; CHRISTOPHER G. MEHNE, as Personal
14 Representative of the Estate of JADE PAOLA-REYES-LUNA, deceased; ALYANNA
15 CAROLINA REYES-CISNEROS, as HEIR to the Decedent, JADE PAOLA REYES-
16 LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent,
17 JADE PAOLA REYES-LUNA, deceased; VICTORIA REYES-CISNEROS, as HEIR to
18 the Decedent, JADE PAOLA REYES-LUNA, deceased; CHRISTOPHER G. MEHNE,
19 as Personal Representative of the Estate of GUILLERMO OCTAVIO REYES-LUNA,
20 deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent
21 GUILLERMO OCTAVIO REYES-LUNA, deceased; SARA ALEJANDRA REYES-
22 LUNA, as HEIR to the Decedent, GUILLERMO OCTAVIO REYES-LUNA, deceased;
23 VICTORIA REYES-CISNEROS, as HEIR to the Decedent, GUILLERMO OCTAVIO
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REYES-LUNA, deceased; and CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of FRIDA ALEJANDRINA REYES-LUNA, deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent, FRIDA ALEJANDRINA REYES-LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent, FRIDA ALEJANDRINA REYES-LUNA, deceased; VICTORIA REYES-CISNEROS, as HEIR to the Decedent, FRIDA ALEJANDRINA REYES-LUNA, deceased; and each of them, and each of them, demand judgment against Defendant, TVPX AIRCRAFT SOLUTIONS, INC., together with interest, costs, and fees.

THIRD CAUSE OF ACTION
(Wrongful Death)

Plaintiffs v. TVPX Aircraft Solutions, Inc.

48. Plaintiffs repeat and reallege each and every allegation and fact contained in this Complaint and incorporate the same herein by reference.

49. That the death of Plaintiff Decedents was caused or contributed by the wrongful acts and/or negligence/gross negligence of Defendant, TVPX AIRCRAFT SOLUTIONS, INC.

50. That, pursuant to NRS 41.085(2), “[w]hen the death of any person . . . is caused by the wrongful act or neglect of another, the heirs of the decedent and personal representatives of the decedent may each maintain an action for damages against the person(s) who caused the death.”

51. That Plaintiff Personal Representative CHRISTOPHER G. MEHNE, as Personal Representative of the Estates of Plaintiff Decedents, and each of them, is entitled to maintain an action for damages against Defendant, TVPX AIRCRAFT

1 SOLUTIONS, INC., for wrongful death, including, but not limited to, damages set
2 forth in NRS 41.085.

3 52. That Plaintiff Heirs are the natural heirs of Plaintiff Decedents and are
4 entitled to maintain an action for damages against Defendant, TVPX AIRCRAFT
5 SOLUTIONS, INC., for wrongful death, including, but not limited to, damages set
6 forth in NRS 41.85.

7 53. On May 5, 2019, as a direct and proximate result of the foregoing
8 acts/omissions by Defendant, TVPX AIRCRAFT SOLUTIONS, INC., the Subject
9 Aircraft was caused to and did experience an inflight loss of airspeed and shortly
10 thereafter entered an aerodynamic stall, followed by a double engine failure and a
11 rapid descent toward the ground, during which the pilots were unable to restart the
12 engines, all of which further resulted in the Subject Aircraft violently crashing into
13 the ground in the State of Coahuila, Mexico, causing all persons aboard to suffer fatal
14 injuries, including Plaintiff Decedents, MANUEL ALEJANDRO SEPÚLVEDA-
15 GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA MONSERRAT MEJIA-
16 SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA LILIANA LUNA-
17 LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO REYES-LUNA,
18 and FRIDA ALEJANDRINA REYES-LUNA, and each of them.

19 54. Prior to their deaths, Plaintiff Decedents MANUEL ALEJANDRO
20 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
21 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
22 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
23 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, were
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1 in good health and would have been capable of earning income. The Plaintiff Heirs,
2 ANA MARÍA GONZÁLEZ-GÓMEZ, MANUEL SEPÚLVEDA-CRUZ, JUAN JOSÉ
3 SALINAS ALMAGUER, LETICIA GUADALUPE TREVIÑO VILLAREAL, MARÍA
4 FERNANDA INIESTRA-MEJÍA, BLANCA JANET MEJÍA-SÁNCHEZ, PEDRO,
5 GABRIEL INIESTRA-GALLARDO, ALYANNA CAROLINA REYES-CISNEROS,
6 SARA ALEJANDRA REYES-LUNA, VICTORIA REYES-CISNEROS, MARÍA DEL
7 PILAR LARROSA-DELGADO, and each of them, and further next of kin of Plaintiff
8 Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-
9 TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-
10 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
11 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
12 LUNA, and each of them, are entitled to the fair monetary value of the Plaintiff
13 Decedents, including, but not limited to, compensation for the loss of the reasonably
14 expected net income, loss of past and future earning capacity, loss of services,
15 protections, care, assistance, society, companionship, comfort, guidance, counsel, and
16 advice of the Plaintiff Decedents and to the reasonable medical, funeral, and burial
17 expenses incurred.

21 55. That, as a direct and proximate result of the foregoing acts/omissions of
22 Defendant, TVPX AIRCRAFT SOLUTIONS, INC., Plaintiffs and Plaintiff Decedents
23 incurred general and special damages, including but not limited to burial and funeral
24 expenses, in excess of fifteen thousand dollars (\$15,000.00); general and
25 compensatory damages, including, but not limited to, great pain of body and mind,
26 disfigurement, mental anguish, shock and agony, pre-death terror, loss of enjoyment
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1 of life, in excess of fifteen thousand dollars (\$15,000.00); pecuniary damages in excess
2 of fifteen thousand dollars (\$15,000.00).

3 56. That as a direct and proximate result of the foregoing acts/omissions of
4 Defendant, TVPX AIRCRAFT SOLUTIONS, INC., Plaintiffs may recover penalty and
5 punitive damages that would have recovered if Plaintiff Decedents have survived and
6 that Plaintiffs have been required to engage in the services of an attorney, incurring
7 attorneys' fees and costs to bring this action.

8 57. WHEREFORE, Plaintiff, CHRISTOPHER G. MEHNE, as Personal
9 Representative of the Estate of MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
10 deceased; ANA MARÍA GONZÁLEZ-GÓMEZ, as HEIR to the Decedent, MANUEL
11 ALEJANDRO SEPÚLVEDA-GONZÁLEZ, deceased; MANUEL SEPÚLVEDA-CRUZ,
12 as HEIR to the Decedent, MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
13 deceased; CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of
14 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; JUAN JOSÉ SALINAS
15 ALMAGUER, as HEIR to the Decedent, MÓNICA LETICIA SALINAS-TREVIÑO,
16 deceased; LETICIA GUADALUPE TREVIÑO VILLAREAL, as HEIR to the Decedent,
17 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; CHRISTOPHER G. MEHNE, as
18 Personal Representative to the Estate of ADRIANA MONSERRAT MEJÍA-
19 SÁNCHEZ, deceased; MARÍA FERNANDA INIESTRA-MEJÍA, as HEIR to the
20 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; BLANCA JANET
21 MEJÍA-SÁNCHEZ, as HEIR to the Decedent, ADRIANA MONSERRAT MEJÍA-
22 SÁNCHEZ, deceased; PEDRO GABRIEL INIESTRA-GALLARDO, as HEIR to the
23 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; CHRISTOPHER
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1 G. MEHNE, as Personal Representative of the Estate of LUIS OCTAVIO REYES-
2 DOMÍNGUEZ, deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to
3 the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ, deceased; SARA ALEJANDRA
4 REYES-LUNA, as HEIR to the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ,
5 deceased; VICTORIA REYES-CISNEROS, as HEIR to the Decedent, LUIS OCTAVIO
6 REYES-DOMÍNGUEZ, deceased; CHRISTOPHER G. MEHNE, as Personal
7 Representative of the Estate of LOYDA LILIANA LUNA-LARROSA, deceased;
8 MARÍA DEL PILAR LARROSA-DELGADO, as HEIR to the Decedent, LOYDA
9 LILIANA LUNA-LARROSA, deceased; CHRISTOPHER G. MEHNE, as Personal
10 Representative of the Estate of JADE PAOLA-REYES-LUNA, deceased; ALYANNA
11 CAROLINA REYES-CISNEROS, as HEIR to the Decedent, JADE PAOLA REYES-
12 LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent,
13 JADE PAOLA REYES-LUNA, deceased; VICTORIA REYES-CISNEROS, as HEIR to
14 the Decedent, JADE PAOLA REYES-LUNA, deceased; CHRISTOPHER G. MEHNE,
15 as Personal Representative of the Estate of GUILLERMO OCTAVIO REYES-LUNA,
16 deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent
17 GUILLERMO OCTAVIO REYES-LUNA, deceased; SARA ALEJANDRA REYES-
18 LUNA, as HEIR to the Decedent, GUILLERMO OCTAVIO REYES-LUNA, deceased;
19 VICTORIA REYES-CISNEROS, as HEIR to the Decedent, GUILLERMO OCTAVIO
20 REYES-LUNA, deceased; and CHRISTOPHER G. MEHNE, as Personal
21 Representative of the Estate of FRIDA ALEJANDRINA REYES-LUNA, deceased;
22 ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent, FRIDA
23 ALEJANDRINA REYES-LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as
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1 HEIR to the Decedent, FRIDA ALEJANDRINA REYES-LUNA, deceased; VICTORIA
 2 REYES-CISNEROS, as HEIR to the Decedent, FRIDA ALEJANDRINA REYES-
 3 LUNA, deceased; and each of them, and each of them, demand judgment against
 4 Defendant, TVPX AIRCRAFT SOLUTIONS, INC., together with interest, costs, and
 5 fees.
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7 **FOURTH CAUSE OF ACTION**
 8 **(Negligence)**

9 **Plaintiffs v. Compañía de Aviación y Logística Empresarial S.A. de C.V.**

10 58. Plaintiffs repeat and reallege each and every allegation and fact
 11 contained in this Complaint and incorporate the same herein by reference.

12 59. On May 5, 2019, and at all times relevant, Defendant, COMPAÑÍA DE
 13 AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V., owed a duty to Plaintiff
 14 Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-
 15 TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-
 16 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
 17 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
 18 LUNA, and each of them, to exercise ordinary care in the ownership, entrustment,
 19 operation, and control of the Subject Aircraft, so as not cause injury to their persons.

20 60. On May 5, 2019, Defendant, COMPAÑÍA DE AVIACIÓN Y LOGISTICA
 21 EMPRESARIAL S.A. DE C.V., individually and/or through its agents, servants,
 22 employees, and/or licensees, including, but not limited to the pilots of the Subject
 23 Aircraft, Juan Jose Aguilar Talavera and Luis Ovidio Gonzalez Flores, and each of
 24 them, breached their duty of care to Plaintiff Decedents, MANUEL ALEJANDRO
 25 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA

1 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
2 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
3 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, in one
4 or more of the following particulars:
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- 6 a) Negligently and carelessly failed to conduct proper and adequate
7 pre-flight planning in Las Vegas prior to initiating the accident
flight;
- 8 b) Negligently and carelessly failed to conduct proper and adequate
9 pre-flight inspection and checks of the Subject Aircraft in Las
Vegas prior to initiating the accident flight;
- 10 c) Negligently and carelessly operated the Subject Aircraft during
11 the accident flight;
- 12 d) Negligently and carelessly failed to provide or ensure the
13 provision of updates and supplements to flight manuals,
14 maintenance manuals, airworthiness directives, service bulletins,
15 and other publications and information necessary for the
airworthiness and safe operation of the Subject Aircraft;
- 16 e) Negligently and carelessly operated the Subject Aircraft with
17 pilots who lacked proper and adequate education, training,
experience, and/or skills to pilot the Subject Aircraft in a safe
manner;
- 18 f) Negligently and carelessly failed to provide and ensure proper and
19 adequate training and certification of pilots permitted to operate
20 the Subject Aircraft;
- 21 g) Negligently and carelessly maintained the Subject Aircraft;
- 22 h) Negligently and carelessly failed to provide and ensure proper and
23 adequate training and certification of mechanics permitted to
24 perform maintenance, repair and overhaul work on the Subject
25 Aircraft, the subject engines, and other component parts of the
Subject Aircraft; and/or
- 26 i) It otherwise negligently and carelessly owned, entrusted, operated
27 and/or controlled the Subject Aircraft in an unsafe and dangerous
manner in particulars to be determined through discovery herein.
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1 61. On May 5, 2019, as a direct and proximate result of the foregoing breach
2 of duty by Defendant, COMPAÑÍA DE AVIACIÓN Y LOGISTICA EMPRESARIAL
3 S.A. DE C.V., the Subject Aircraft was caused to and did experience an inflight loss of
4 airspeed and, shortly thereafter, entered an aerodynamic stall, followed by a double
5 engine failure and a rapid descent toward the ground, during which the pilots were
6 unable to restart the engines, all of which further resulted in the Subject Aircraft
7 violently crashing into the ground in the State of Coahuila, Mexico, causing all
8 persons aboard to suffer fatal injuries, including Plaintiff Decedents, MANUEL
9 ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
10 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
11 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
12 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them.

13 62. Prior to their deaths, Plaintiff Decedents, MANUEL ALEJANDRO
14 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
15 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
16 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
17 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, were
18 in good health and would have been capable of earning income. The Plaintiff Heirs,
19 ANA MARÍA GONZÁLEZ-GÓMEZ, MANUEL SEPÚLVEDA-CRUZ, JUAN JOSÉ
20 SALINAS ALMAGUER, LETICIA GUADALUPE TREVIÑO VILLAREAL, MARÍA
21 FERNANDA INIESTRA-MEJÍA, BLANCA JANET MEJÍA-SÁNCHEZ, PEDRO,
22 GABRIEL INIESTRA-GALLARDO, ALYANNA CAROLINA REYES-CISNEROS,
23 SARA ALEJANDRA REYES-LUNA, VICTORIA REYES-CISNEROS, MARÍA DEL
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1 PILAR LARROSA-DELGADO, and each of them, and further next of kin of Plaintiff
2 Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-
3 TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-
4 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
5 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
6 LUNA, and each of them, are entitled to the fair monetary value of the Plaintiff
7 Decedents, including, but not limited to, compensation for the loss of the reasonably
8 expected net income, loss of past and future earning capacity, loss of services,
9 protections, care, assistance, society, companionship, comfort, guidance, counsel, and
10 advice of the Plaintiff Decedents and to the reasonable medical, funeral, and burial
11 expenses incurred.

12 63. That, as a direct and proximate result of the negligent acts/omissions of
13 Defendant, COMPAÑÍA DE AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE
14 C.V., Plaintiffs and Plaintiff Decedents incurred general and special damages in
15 excess of fifteen thousand dollars (\$15,000.00); general and compensatory damages,
16 including, but not limited to, pre-death great pain of body and mind, pre-death
17 disfigurement, pre-death mental anguish, pre-death shock and agony, pre-death
18 terror, and loss of enjoyment of life, in excess of fifteen thousand dollars (\$15,000.00);
19 pecuniary damages in excess of fifteen thousand dollars (\$15,000.00).

20 64. That as a direct and proximate result of the aforementioned negligence
21 of Defendant, COMPAÑÍA DE AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE
22 C.V., Plaintiffs may recover penalty and punitive damages that would have recovered
23 if Plaintiff Decedents have survived and that Plaintiffs have been required to engage
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1 in the services of an attorney, incurring attorneys' fees and costs to bring this action.

2 65. WHEREFORE, Plaintiff, CHRISTOPHER G. MEHNE, as Personal
3 Representative of the Estate of MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
4 deceased; ANA MARÍA GONZÁLEZ-GÓMEZ, as HEIR to the Decedent, MANUEL
5 ALEJANDRO SEPÚLVEDA-GONZÁLEZ, deceased; MANUEL SEPÚLVEDA-CRUZ,
6 as HEIR to the Decedent, MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
7 deceased; CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of
8 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; JUAN JOSÉ SALINAS
9 ALMAGUER, as HEIR to the Decedent, MÓNICA LETICIA SALINAS-TREVIÑO,
10 deceased; LETICIA GUADALUPE TREVIÑO VILLAREAL, as HEIR to the Decedent,
11 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; CHRISTOPHER G. MEHNE, as
12 Personal Representative to the Estate of ADRIANA MONSERRAT MEJÍA-
13 SÁNCHEZ, deceased; MARÍA FERNANDA INIESTRA-MEJÍA, as HEIR to the
14 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; BLANCA JANET
15 MEJÍA-SÁNCHEZ, as HEIR to the Decedent, ADRIANA MONSERRAT MEJÍA-
16 SÁNCHEZ, deceased; PEDRO GABRIEL INIESTRA-GALLARDO, as HEIR to the
17 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; CHRISTOPHER
18 G. MEHNE, as Personal Representative of the Estate of LUIS OCTAVIO REYES-
19 DOMÍNGUEZ, deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to
20 the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ, deceased; SARA ALEJANDRA
21 REYES-LUNA, as HEIR to the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ,
22 deceased; VICTORIA REYES-CISNEROS, as HEIR to the Decedent, LUIS OCTAVIO
23 REYES-DOMÍNGUEZ, deceased; CHRISTOPHER G. MEHNE, as Personal
24 Representative of the Estate of LUIS OCTAVIO REYES-DOMÍNGUEZ,
25 deceased; CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of
26 LUIS OCTAVIO REYES-DOMÍNGUEZ, deceased; CHRISTOPHER G. MEHNE, as Personal
27 Representative of the Estate of LUIS OCTAVIO REYES-DOMÍNGUEZ,
28 deceased; CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of

1 Representative of the Estate of LOYDA LILIANA LUNA-LARROSA, deceased;
2 MARÍA DEL PILAR LARROSA-DELGADO, as HEIR to the Decedent, LOYDA
3 LILIANA LUNA-LARROSA, deceased; CHRISTOPHER G. MEHNE, as Personal
4 Representative of the Estate of JADE PAOLA-REYES-LUNA, deceased; ALYANNA
5 CAROLINA REYES-CISNEROS, as HEIR to the Decedent, JADE PAOLA REYES-
6 LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent,
7 JADE PAOLA REYES-LUNA, deceased; VICTORIA REYES-CISNEROS, as HEIR to
8 the Decedent, JADE PAOLA REYES-LUNA, deceased; CHRISTOPHER G. MEHNE,
9 as Personal Representative of the Estate of GUILLERMO OCTAVIO REYES-LUNA,
10 deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent
11 GUILLERMO OCTAVIO REYES-LUNA, deceased; SARA ALEJANDRA REYES-
12 LUNA, as HEIR to the Decedent, GUILLERMO OCTAVIO REYES-LUNA, deceased;
13 VICTORIA REYES-CISNEROS, as HEIR to the Decedent, GUILLERMO OCTAVIO
14 REYES-LUNA, deceased; and CHRISTOPHER G. MEHNE, as Personal
15 Representative of the Estate of FRIDA ALEJANDRINA REYES-LUNA, deceased;
16 ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent, FRIDA
17 ALEJANDRINA REYES-LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as
18 HEIR to the Decedent, FRIDA ALEJANDRINA REYES-LUNA, deceased; VICTORIA
19 REYES-CISNEROS, as HEIR to the Decedent, FRIDA ALEJANDRINA REYES-
20 LUNA, deceased; and each of them, and each of them, demand judgment against
21 Defendant, COMPAÑÍA DE AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE
22 C.V., together with interest, costs, and fees.
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FIFTH CAUSE OF ACTION
(Gross Negligence)

Plaintiffs v. Compañía de Aviación y Logística Empresarial S.A. de C.V.

1 66. Plaintiffs repeat and reallege each and every allegation and fact
 2 contained in this Complaint and incorporate the same herein by reference.
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5 67. On May 5, 2019, and at all times relevant, Defendant, COMPAÑÍA DE
 6 AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V., owed a duty to Plaintiff
 7 Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-
 8 TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-
 9 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
 10 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
 11 LUNA, and each of them, to exercise ordinary care in the ownership, entrustment,
 12 operation, and control of the Subject Aircraft so as not cause injury to their persons.
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15 68. On May 5, 2019, Defendant, COMPAÑÍA DE AVIACIÓN Y LOGISTICA
 16 EMPRESARIAL S.A. DE C.V., individually and/or through its agents, servants,
 17 employees, and/or licensees, including, but not limited to the pilots of the Subject
 18 Aircraft, Juan Jose Aguilar Talavera and Luis Ovidio Gonzalez Flores, and each of
 19 them, acted recklessly, maliciously, and willfully, whereupon Defendant, COMPAÑÍA
 20 DE AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V., breached its duty of
 21 care to Plaintiff Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ,
 22 LETICIA SALINAS-TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS
 23 OCTAVIO REYES-DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE
 24 PAOLA REYES-LUNA, GUILLERMO OCTAVIO REYES-LUNA, and FRIDA
 25 ALEJANDRINA REYES-LUNA, and each of them, in one or more of the following
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1 particulars:

- 2 a) Recklessly, maliciously, and willfully failed to conduct proper and
3 adequate pre-flight planning in Las Vegas prior to initiating the
4 accident flight;
- 5 b) Recklessly, maliciously, and willfully failed to conduct proper and
6 adequate pre-flight inspection and checks of the Subject Aircraft
7 in Las Vegas prior to initiating the accident flight;
- 8 c) Recklessly, maliciously, and willfully operated the Subject
9 Aircraft during the accident flight;
- 10 d) Recklessly, maliciously, and willfully failed to provide or ensure
11 the provision of updates and supplements to flight manuals,
12 maintenance manuals, airworthiness directives, service bulletins,
13 and other publications and information necessary for the
14 airworthiness and safe operation of the Subject Aircraft;
- 15 e) Recklessly, maliciously, and willfully operated the Subject
16 Aircraft with pilots who lacked proper and adequate education,
17 training, experience, and/or skills to pilot the Subject Aircraft in a
18 safe manner;
- 19 f) Recklessly, maliciously, and willfully failed to provide and ensure
20 proper and adequate training and certification of pilots permitted
21 to operate the Subject Aircraft;
- 22 g) Recklessly, maliciously, and willfully maintained the Subject
23 Aircraft;
- 24 h) Recklessly, maliciously, and willfully failed to provide and ensure
25 proper and adequate training and certification of mechanics
26 permitted to perform maintenance, repair and overhaul work on
27 the Subject Aircraft, the subject engines, and other component
28 parts of the Subject Aircraft; and/or
- 29 i) It otherwise Recklessly, maliciously, and willfully owned,
30 entrusted, operated and/or controlled the Subject Aircraft in an
31 unsafe and dangerous manner in particulars to be determined
32 through discovery herein.

33 69. On May 5, 2019, as a direct and proximate result of the foregoing
34 reckless, malicious, and/or willful acts/omissions by Defendant, COMPAÑÍA DE
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1 AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V., the Subject Aircraft was
2 caused to and did experience an inflight loss of airspeed and shortly thereafter
3 entered an aerodynamic stall, followed by a double engine failure and a rapid descent
4 toward the ground, during which the pilots were unable to restart the engines, all of
5 which further resulted in the Subject Aircraft violently crashing into the ground in
6 the State of Coahuila, Mexico, causing all persons aboard to suffer fatal injuries,
7 including Plaintiff Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ,
8 LETICIA SALINAS-TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS
9 OCTAVIO REYES-DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE
10 PAOLA REYES-LUNA, GUILLERMO OCTAVIO REYES-LUNA, and FRIDA
11 ALEJANDRINA REYES-LUNA, and each of them.

14 70. Prior to their deaths, Plaintiff Decedents MANUEL ALEJANDRO
15 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
16 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
17 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
18 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, were
19 in good health and would have been capable of earning income. The Plaintiff Heirs,
20 ANA MARÍA GONZÁLEZ-GÓMEZ, MANUEL SEPÚLVEDA-CRUZ, JUAN JOSÉ
21 SALINAS ALMAGUER, LETICIA GUADALUPE TREVIÑO VILLAREAL, MARÍA
22 FERNANDA INIESTRA-MEJÍA, BLANCA JANET MEJÍA-SÁNCHEZ, PEDRO,
23 GABRIEL INIESTRA-GALLARDO, ALYANNA CAROLINA REYES-CISNEROS,
24 SARA ALEJANDRA REYES-LUNA, VICTORIA REYES-CISNEROS, MARÍA DEL
25 PILAR LARROSA-DELGADO, and each of them, and further next of kin of Plaintiff
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1 Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-
2 TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-
3 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
4 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
5 LUNA, and each of them, are entitled to the fair monetary value of the Plaintiff
6 Decedents, including, but not limited to, compensation for the loss of the reasonably
7 expected net income, loss of past and future earning capacity, loss of services,
8 protections, care, assistance, society, companionship, comfort, guidance, counsel, and
9 advice of the Plaintiff Decedents and to the reasonable medical, funeral, and burial
10 expenses incurred.

13 71. That, as a direct and proximate result of the reckless, malicious, and/or
14 willful acts/omissions of Defendant, COMPAÑÍA DE AVIACIÓN Y LOGISTICA
15 EMPRESARIAL S.A. DE C.V., Plaintiffs and Plaintiff Decedents incurred general
16 and special damages, including but not limited to burial and funeral expenses, in
17 excess of fifteen thousand dollars (\$15,000.00); general and compensatory damages,
18 including, but not limited to, great pain of body and mind, disfigurement, mental
19 anguish, shock and agony, pre-death terror, loss of enjoyment of life, in excess of
20 fifteen thousand dollars (\$15,000.00); pecuniary damages in excess of fifteen
21 thousand dollars (\$15,000.00).

24 72. That as a direct and proximate result of the aforementioned reckless,
25 malicious, and/or willful acts/omissions of Defendant, COMPAÑÍA DE AVIACIÓN Y
26 LOGISTICA EMPRESARIAL S.A. DE C.V., Plaintiffs may recover penalty and
27 punitive damages that would have recovered if Plaintiff Decedents have survived and
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1 that Plaintiffs have been required to engage in the services of an attorney, incurring
2 attorneys' fees and costs to bring this action.

3 73. WHEREFORE, Plaintiff, CHRISTOPHER G. MEHNE, as Personal
4 Representative of the Estate of MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
5 deceased; ANA MARÍA GONZÁLEZ-GÓMEZ, as HEIR to the Decedent, MANUEL
6 ALEJANDRO SEPÚLVEDA-GONZÁLEZ, deceased; MANUEL SEPÚLVEDA-CRUZ,
7 as HEIR to the Decedent, MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
8 deceased; CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of
9 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; JUAN JOSÉ SALINAS
10 ALMAGUER, as HEIR to the Decedent, MÓNICA LETICIA SALINAS-TREVIÑO,
11 deceased; LETICIA GUADALUPE TREVIÑO VILLAREAL, as HEIR to the Decedent,
12 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; CHRISTOPHER G. MEHNE, as
13 Personal Representative to the Estate of ADRIANA MONSERRAT MEJÍA-
14 SÁNCHEZ, deceased; MARÍA FERNANDA INIESTRA-MEJÍA, as HEIR to the
15 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; BLANCA JANET
16 MEJÍA-SÁNCHEZ, as HEIR to the Decedent, ADRIANA MONSERRAT MEJÍA-
17 SÁNCHEZ, deceased; PEDRO GABRIEL INIESTRA-GALLARDO, as HEIR to the
18 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; CHRISTOPHER
19 G. MEHNE, as Personal Representative of the Estate of LUIS OCTAVIO REYES-
20 DOMÍNGUEZ, deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to
21 the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ, deceased; SARA ALEJANDRA
22 REYES-LUNA, as HEIR to the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ,
23 deceased; VICTORIA REYES-CISNEROS, as HEIR to the Decedent, LUIS OCTAVIO
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1 REYES-DOMÍNGUEZ, deceased; CHRISTOPHER G. MEHNE, as Personal
2 Representative of the Estate of LOYDA LILIANA LUNA-LARROSA, deceased;
3 MARÍA DEL PILAR LARROSA-DELGADO, as HEIR to the Decedent, LOYDA
4 LILIANA LUNA-LARROSA, deceased; CHRISTOPHER G. MEHNE, as Personal
5 Representative of the Estate of JADE PAOLA-REYES-LUNA, deceased; ALYANNA
6 CAROLINA REYES-CISNEROS, as HEIR to the Decedent, JADE PAOLA REYES-
7 LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent,
8 JADE PAOLA REYES-LUNA, deceased; VICTORIA REYES-CISNEROS, as HEIR to
9 the Decedent, JADE PAOLA REYES-LUNA, deceased; CHRISTOPHER G. MEHNE,
10 as Personal Representative of the Estate of GUILLERMO OCTAVIO REYES-LUNA,
11 deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent
12 GUILLERMO OCTAVIO REYES-LUNA, deceased; SARA ALEJANDRA REYES-
13 LUNA, as HEIR to the Decedent, GUILLERMO OCTAVIO REYES-LUNA, deceased;
14 VICTORIA REYES-CISNEROS, as HEIR to the Decedent, GUILLERMO OCTAVIO
15 REYES-LUNA, deceased; and CHRISTOPHER G. MEHNE, as Personal
16 Representative of the Estate of FRIDA ALEJANDRINA REYES-LUNA, deceased;
17 ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent, FRIDA
18 ALEJANDRINA REYES-LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as
19 HEIR to the Decedent, FRIDA ALEJANDRINA REYES-LUNA, deceased; VICTORIA
20 REYES-CISNEROS, as HEIR to the Decedent, FRIDA ALEJANDRINA REYES-
21 LUNA, deceased; and each of them, and each of them, demand judgment against
22 Defendant, COMPAÑÍA DE AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE
23 C.V., together with interest, costs, and fees.
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SIXTH CAUSE OF ACTION
(Wrongful Death)

Plaintiffs v. Compañía de Aviación y Logística Empresarial S.A. de C.V.

74. Plaintiffs repeat and reallege each and every allegation and fact contained in this Complaint and incorporate the same herein by reference.

75. That the death of Plaintiff Decedents was caused or contributed by the wrongful acts and/or negligence/gross negligence of Defendant, COMPAÑÍA DE AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V.

76. That, pursuant to NRS 41.085(2), “[w]hen the death of any person . . . is caused by the wrongful act or neglect of another, the heirs of the decedent and personal representatives of the decedent may each maintain an action for damages against the person(s) who caused the death.”

77. That Plaintiff Personal Representative CHRISTOPHER G. MEHNE, as Personal Representative of the Estates of Plaintiff Decedents, and each of them, is entitled to maintain an action for damages against Defendant, COMPAÑÍA DE AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V., for wrongful death, including, but not limited to, damages set forth in NRS 41.085.

78. That Plaintiff Heirs are the natural heirs of Plaintiff Decedents and are entitled to maintain an action for damages against Defendant, COMPAÑÍA DE AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V., for wrongful death, including, but not limited to, damages set forth in NRS 41.85.

79. On May 5, 2019, as a direct and proximate result of the foregoing acts/omissions by Defendant, COMPAÑÍA DE AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V., the Subject Aircraft was caused to and did experience

1 an inflight loss of airspeed and shortly thereafter entered an aerodynamic stall,
2 followed by a double engine failure and a rapid descent toward the ground, during
3 which the pilots were unable to restart the engines, all of which further resulted in
4 the Subject Aircraft violently crashing into the ground in the State of Coahuila,
5 Mexico, causing all persons aboard to suffer fatal injuries, including Plaintiff
6 Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-
7 TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-
8 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
9 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
10 LUNA, and each of them.

13 80. Prior to their deaths, Plaintiff Decedents MANUEL ALEJANDRO
14 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
15 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
16 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
17 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, were
18 in good health and would have been capable of earning income. The Plaintiff Heirs,
19 ANA MARÍA GONZÁLEZ-GÓMEZ, MANUEL SEPÚLVEDA-CRUZ, JUAN JOSÉ
20 SALINAS ALMAGUER, LETICIA GUADALUPE TREVIÑO VILLAREAL, MARÍA
21 FERNANDA INIESTRA-MEJÍA, BLANCA JANET MEJÍA-SÁNCHEZ, PEDRO,
22 GABRIEL INIESTRA-GALLARDO, ALYANNA CAROLINA REYES-CISNEROS,
23 SARA ALEJANDRA REYES-LUNA, VICTORIA REYES-CISNEROS, MARÍA DEL
24 PILAR LARROSA-DELGADO, and each of them, and further next of kin of Plaintiff
25 Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-
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1 TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-
 2 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
 3 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
 4 LUNA, and each of them, are entitled to the fair monetary value of the Plaintiff
 5 Decedents, including, but not limited to, compensation for the loss of the reasonably
 6 expected net income, loss of past and future earning capacity, loss of services,
 7 protections, care, assistance, society, companionship, comfort, guidance, counsel, and
 8 advice of the Plaintiff Decedents and to the reasonable medical, funeral, and burial
 9 expenses incurred.
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11 81. That, as a direct and proximate result of the foregoing acts/omissions of
 12 Defendant, COMPAÑÍA DE AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE
 13 C.V., Plaintiffs and Plaintiff Decedents incurred general and special damages,
 14 including but not limited to burial and funeral expenses, in excess of fifteen thousand
 15 dollars (\$15,000.00); general and compensatory damages, including, but not limited
 16 to, great pain of body and mind, disfigurement, mental anguish, shock and agony,
 17 pre-death terror, loss of enjoyment of life, in excess of fifteen thousand dollars
 18 (\$15,000.00); pecuniary damages in excess of fifteen thousand dollars (\$15,000.00).
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20 82. That as a direct and proximate result of the foregoing acts/omissions of
 21 Defendant, COMPAÑÍA DE AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE
 22 C.V., Plaintiffs may recover penalty and punitive damages that would have recovered
 23 if Plaintiff Decedents have survived and that Plaintiffs have been required to engage
 24 in the services of an attorney, incurring attorneys' fees and costs to bring this action.
 25

26 83. WHEREFORE, Plaintiff, CHRISTOPHER G. MEHNE, as Personal
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1 Representative of the Estate of MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
2 deceased; ANA MARÍA GONZÁLEZ-GÓMEZ, as HEIR to the Decedent, MANUEL
3 ALEJANDRO SEPÚLVEDA-GONZÁLEZ, deceased; MANUEL SEPÚLVEDA-CRUZ,
4 as HEIR to the Decedent, MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
5 deceased; CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of
6 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; JUAN JOSÉ SALINAS
7 ALMAGUER, as HEIR to the Decedent, MÓNICA LETICIA SALINAS-TREVIÑO,
8 deceased; LETICIA GUADALUPE TREVIÑO VILLAREAL, as HEIR to the Decedent,
9 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; CHRISTOPHER G. MEHNE, as
10 Personal Representative to the Estate of ADRIANA MONSERRAT MEJÍA-
11 SÁNCHEZ, deceased; MARÍA FERNANDA INIESTRA-MEJÍA, as HEIR to the
12 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; BLANCA JANET
13 MEJÍA-SÁNCHEZ, as HEIR to the Decedent, ADRIANA MONSERRAT MEJÍA-
14 SÁNCHEZ, deceased; PEDRO GABRIEL INIESTRA-GALLARDO, as HEIR to the
15 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; CHRISTOPHER
16 G. MEHNE, as Personal Representative of the Estate of LUIS OCTAVIO REYES-
17 DOMÍNGUEZ, deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to
18 the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ, deceased; SARA ALEJANDRA
19 REYES-LUNA, as HEIR to the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ,
20 deceased; VICTORIA REYES-CISNEROS, as HEIR to the Decedent, LUIS OCTAVIO
21 REYES-DOMÍNGUEZ, deceased; CHRISTOPHER G. MEHNE, as Personal
22 Representative of the Estate of LOYDA LILIANA LUNA-LARROSA, deceased;
23 MARÍA DEL PILAR LARROSA-DELGADO, as HEIR to the Decedent, LOYDA
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LILIANA LUNA-LARROSA, deceased; CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of JADE PAOLA-REYES-LUNA, deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent, JADE PAOLA REYES-LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent, JADE PAOLA REYES-LUNA, deceased; VICTORIA REYES-CISNEROS, as HEIR to the Decedent, JADE PAOLA REYES-LUNA, deceased; CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of GUILLERMO OCTAVIO REYES-LUNA, deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent GUILLERMO OCTAVIO REYES-LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent, GUILLERMO OCTAVIO REYES-LUNA, deceased; VICTORIA REYES-CISNEROS, as HEIR to the Decedent, GUILLERMO OCTAVIO REYES-LUNA, deceased; and CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of FRIDA ALEJANDRINA REYES-LUNA, deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent, FRIDA ALEJANDRINA REYES-LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent, FRIDA ALEJANDRINA REYES-LUNA, deceased; VICTORIA REYES-CISNEROS, as HEIR to the Decedent, FRIDA ALEJANDRINA REYES-LUNA, deceased; and each of them, and each of them, demand judgment against Defendant, COMPAÑÍA DE AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V., together with interest, costs, and fees.

SEVENTH CAUSE OF ACTION
(Negligence)

Plaintiffs v. TVPX 2017 MSN 5043 Business Trust

84. Plaintiffs repeat and reallege each and every allegation and fact

1 contained in this Complaint and incorporate the same herein by reference.

2 85. On May 5, 2019, and at all times relevant, Defendant, TVPX 2017 MSN
 3 5043 BUSINESS TRUST, owed a duty to Plaintiff Decedents, MANUEL
 4 ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
 5 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
 6 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
 7 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, to
 8 exercise ordinary care in the ownership, entrustment, operation, and control of the
 9 Subject Aircraft, so as not cause injury to their persons.
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11 86. On May 5, 2019, Defendant, TVPX 2017 MSN 5043 BUSINESS TRUST,
 12 individually and/or through its agents, servants, employees, and/or licensees,
 13 including, but not limited to the pilots of the Subject Aircraft, Juan Jose Aguilar
 14 Talavera and Luis Ovidio Gonzalez Flores, and each of them, breached their duty of
 15 care to Plaintiff Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ,
 16 LETICIA SALINAS-TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS
 17 OCTAVIO REYES-DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE
 18 PAOLA REYES-LUNA, GUILLERMO OCTAVIO REYES-LUNA, and FRIDA
 19 ALEJANDRINA REYES-LUNA, and each of them, in one or more of the following
 20 particulars:
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- 22 a) Negligently and carelessly entrusted the Subject Aircraft, which
 23 was a dangerous instrumentality, to Defendant, COMPAÑÍA DE
 24 AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V., when it
 25 knew, or should have known, that Defendant, COMPAÑÍA DE
 26 AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V., was
 27 likely to operate it in an unsafe and dangerous manner;
- 28 b) Negligently and carelessly permitted Defendant, COMPAÑÍA DE

1 AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V., to
2 continue to operate the Subject Aircraft when it had actual or
3 constructive notice that Defendant, COMPAÑÍA DE AVIACIÓN Y
4 LOGISTICA EMPRESARIAL S.A. DE C.V., was operating the
5 Subject Aircraft in an unsafe and dangerous manner;

- 6 c) Negligently and carelessly failed to provide or ensure the
7 provision of updates and supplements to flight manuals,
8 maintenance manuals, airworthiness directives, service bulletins,
9 and other publications and information necessary for the
10 airworthiness and safe operation of the Subject Aircraft;
- 11 d) Negligently and carelessly operated the Subject Aircraft with
12 pilots who lacked proper and adequate education, training,
13 experience, and/or skills to pilot the Subject Aircraft in a safe
14 manner;
- 15 e) Negligently and carelessly failed to provide and ensure proper and
16 adequate training and certification of pilots permitted to operate
17 the Subject Aircraft;
- 18 f) Negligently and carelessly maintained the Subject Aircraft;
- 19 g) Negligently and carelessly failed to provide and ensure proper and
20 adequate training and certification of mechanics permitted to
21 perform maintenance, repair and overhaul work on the Subject
22 Aircraft, the subject engines, and other component parts of the
23 Subject Aircraft; and/or
- 24 h) It otherwise negligently and carelessly owned, entrusted, operated
25 and/or controlled the Subject Aircraft in an unsafe and dangerous
26 manner in particulars to be determined through discovery herein.

27 87. On May 5, 2019, as a direct and proximate result of the foregoing breach
28 of duty by Defendant, TVPX 2017 MSN 5043 BUSINESS TRUST, the Subject
Aircraft was caused to and did experience an inflight loss of airspeed and, shortly
thereafter, entered an aerodynamic stall, followed by a double engine failure and a
rapid descent toward the ground, during which the pilots were unable to restart the
engines, all of which further resulted in the Subject Aircraft violently crashing into
the ground in the State of Coahuila, Mexico, causing all persons aboard to suffer fatal

1 injuries, including Plaintiff Decedents, MANUEL ALEJANDRO SEPÚLVEDA-
2 GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA MONSERRAT MEJIA-
3 SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA LILIANA LUNA-
4 LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO REYES-LUNA,
5 and FRIDA ALEJANDRINA REYES-LUNA, and each of them.

6 88. Prior to their deaths, Plaintiff Decedents, MANUEL ALEJANDRO
7 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
8 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
9 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
10 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, were
11 in good health and would have been capable of earning income. The Plaintiff Heirs,
12 ANA MARÍA GONZÁLEZ-GÓMEZ, MANUEL SEPÚLVEDA-CRUZ, JUAN JOSÉ
13 SALINAS ALMAGUER, LETICIA GUADALUPE TREVIÑO VILLAREAL, MARÍA
14 FERNANDA INIESTRA-MEJÍA, BLANCA JANET MEJÍA-SÁNCHEZ, PEDRO,
15 GABRIEL INIESTRA-GALLARDO, ALYANNA CAROLINA REYES-CISNEROS,
16 SARA ALEJANDRA REYES-LUNA, VICTORIA REYES-CISNEROS, MARÍA DEL
17 PILAR LARROSA-DELGADO, and each of them, and further next of kin of Plaintiff
18 Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-
19 TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-
20 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
21 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
22 LUNA, and each of them, are entitled to the fair monetary value of the Plaintiff
23 Decedents, including, but not limited to, compensation for the loss of the reasonably
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1 expected net income, loss of past and future earning capacity, loss of services,
2 protections, care, assistance, society, companionship, comfort, guidance, counsel, and
3 advice of the Plaintiff Decedents and to the reasonable medical, funeral, and burial
4 expenses incurred.
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6 89. That, as a direct and proximate result of the negligent acts/omissions of
7 Defendant, TVPX 2017 MSN 5043 BUSINESS TRUST, Plaintiffs and Plaintiff
8 Decedents incurred general and special damages in excess of fifteen thousand dollars
9 (\$15,000.00); general and compensatory damages, including, but not limited to, pre-
10 death great pain of body and mind, pre-death disfigurement, pre-death mental
11 anguish, pre-death shock and agony, pre-death terror, and loss of enjoyment of life, in
12 excess of fifteen thousand dollars (\$15,000.00); pecuniary damages in excess of fifteen
13 thousand dollars (\$15,000.00).
14

15 90. That as a direct and proximate result of the aforementioned negligence
16 of Defendant, TVPX 2017 MSN 5043 BUSINESS TRUST, Plaintiffs may recover
17 penalty and punitive damages that would have recovered if Plaintiff Decedents have
18 survived and that Plaintiffs have been required to engage in the services of an
19 attorney, incurring attorneys' fees and costs to bring this action.
20

21 91. WHEREFORE, Plaintiff, CHRISTOPHER G. MEHNE, as Personal
22 Representative of the Estate of MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
23 deceased; ANA MARÍA GONZÁLEZ-GÓMEZ, as HEIR to the Decedent, MANUEL
24 ALEJANDRO SEPÚLVEDA-GONZÁLEZ, deceased; MANUEL SEPÚLVEDA-CRUZ,
25 as HEIR to the Decedent, MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
26 deceased; CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of
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1 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; JUAN JOSÉ SALINAS
2 ALMAGUER, as HEIR to the Decedent, MÓNICA LETICIA SALINAS-TREVIÑO,
3 deceased; LETICIA GUADALUPE TREVIÑO VILLAREAL, as HEIR to the Decedent,
4 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; CHRISTOPHER G. MEHNE, as
5 Personal Representative to the Estate of ADRIANA MONSERRAT MEJÍA-
6 SÁNCHEZ, deceased; MARÍA FERNANDA INIESTRA-MEJÍA, as HEIR to the
7 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; BLANCA JANET
8 MEJÍA-SÁNCHEZ, as HEIR to the Decedent, ADRIANA MONSERRAT MEJÍA-
9 SÁNCHEZ, deceased; PEDRO GABRIEL INIESTRA-GALLARDO, as HEIR to the
10 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; CHRISTOPHER
11 G. MEHNE, as Personal Representative of the Estate of LUIS OCTAVIO REYES-
12 DOMÍNGUEZ, deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to
13 the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ, deceased; SARA ALEJANDRA
14 REYES-LUNA, as HEIR to the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ,
15 deceased; VICTORIA REYES-CISNEROS, as HEIR to the Decedent, LUIS OCTAVIO
16 REYES-DOMÍNGUEZ, deceased; CHRISTOPHER G. MEHNE, as Personal
17 Representative of the Estate of LOYDA LILIANA LUNA-LARROSA, deceased;
18 MARÍA DEL PILAR LARROSA-DELGADO, as HEIR to the Decedent, LOYDA
19 LILIANA LUNA-LARROSA, deceased; CHRISTOPHER G. MEHNE, as Personal
20 Representative of the Estate of JADE PAOLA-REYES-LUNA, deceased; ALYANNA
21 CAROLINA REYES-CISNEROS, as HEIR to the Decedent, JADE PAOLA REYES-
22 LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent,
23 JADE PAOLA REYES-LUNA, deceased; VICTORIA REYES-CISNEROS, as HEIR to
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1 the Decedent, JADE PAOLA REYES-LUNA, deceased; CHRISTOPHER G. MEHNE,
2 as Personal Representative of the Estate of GUILLERMO OCTAVIO REYES-LUNA,
3 deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent
4 GUILLERMO OCTAVIO REYES-LUNA, deceased; SARA ALEJANDRA REYES-
5 LUNA, as HEIR to the Decedent, GUILLERMO OCTAVIO REYES-LUNA, deceased;
6 VICTORIA REYES-CISNEROS, as HEIR to the Decedent, GUILLERMO OCTAVIO
7 REYES-LUNA, deceased; and CHRISTOPHER G. MEHNE, as Personal
8 Representative of the Estate of FRIDA ALEJANDRINA REYES-LUNA, deceased;
9 ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent, FRIDA
10 ALEJANDRINA REYES-LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as
11 HEIR to the Decedent, FRIDA ALEJANDRINA REYES-LUNA, deceased; VICTORIA
12 REYES-CISNEROS, as HEIR to the Decedent, FRIDA ALEJANDRINA REYES-
13 LUNA, deceased; and each of them, and each of them, demand judgment against
14 Defendant, TVPX 2017 MSN 5043 BUSINESS TRUST, together with interest, costs,
15 and fees.

EIGHTH CAUSE OF ACTION
(Gross Negligence)

Plaintiffs v. TVPX 2017 MSN 5043 Business Trust

21 92. Plaintiffs repeat and reallege each and every allegation and fact
22 contained in this Complaint and incorporate the same herein by reference.
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24 93. On May 5, 2019, and at all times relevant, Defendant, TVPX 2017 MSN
25 5043 BUSINESS TRUST, owed a duty to Plaintiff Decedents, MANUEL
26 ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
27 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA

1 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
 2 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, to
 3 exercise ordinary care in the ownership, entrustment, operation, and control of the
 4 Subject Aircraft so as not cause injury to their persons.
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6 94. On May 5, 2019, Defendant, TVPX 2017 MSN 5043 BUSINESS TRUST,
 7 individually and/or through its agents, servants, employees, and/or licensees,
 8 including, but not limited to the pilots of the Subject Aircraft, Juan Jose Aguilar
 9 Talavera and Luis Ovidio Gonzalez Flores, and each of them, acted recklessly,
 10 maliciously, and willfully, whereupon Defendant, TVPX AIRCRAFT SOLUTIONS,
 11 INC., breached its duty of care to Plaintiff Decedents, MANUEL ALEJANDRO
 12 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
 13 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
 14 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
 15 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, in one
 16 or more of the following particulars:
 17

- 19 a) Recklessly, maliciously, and willfully entrusted the Subject
 20 Aircraft, which was a dangerous instrumentality, to Defendant,
 21 COMPAÑÍA DE AVIACIÓN Y LOGISTICA EMPRESARIAL S.A.
 22 DE C.V., when it knew, or should have known, that Defendant,
 23 COMPAÑÍA DE AVIACIÓN Y LOGISTICA EMPRESARIAL S.A.
 24 DE C.V., was likely to operate it in an unsafe and dangerous
 25 manner;
- 26 b) Recklessly, maliciously, and willfully permitted Defendant,
 27 COMPAÑÍA DE AVIACIÓN Y LOGISTICA EMPRESARIAL S.A.
 28 DE C.V., to continue to operate the Subject Aircraft when it had
 actual or constructive notice that Defendant, COMPAÑÍA DE
 AVIACIÓN Y LOGISTICA EMPRESARIAL S.A. DE C.V., was
 operating the Subject Aircraft in an unsafe and dangerous
 manner;

- 1 c) Recklessly, maliciously, and willfully failed to provide or ensure
2 the provision of updates and supplements to flight manuals,
3 maintenance manuals, airworthiness directives, service bulletins,
4 and other publications and information necessary for the
5 airworthiness and safe operation of the Subject Aircraft;
- 6 d) Recklessly, maliciously, and willfully operated the Subject
7 Aircraft with pilots who lacked proper and adequate education,
8 training, experience, and/or skills to pilot the Subject Aircraft in a
9 safe manner;
- 10 e) Recklessly, maliciously, and willfully failed to provide and ensure
11 proper and adequate training and certification of pilots permitted
12 to operate the Subject Aircraft;
- 13 f) Recklessly, maliciously, and willfully maintained the Subject
14 Aircraft;
- 15 g) Recklessly, maliciously, and willfully failed to provide and ensure
16 proper and adequate training and certification of mechanics
17 permitted to perform maintenance, repair and overhaul work on
18 the Subject Aircraft, the subject engines, and other component
19 parts of the Subject Aircraft; and/or
- 20 h) It otherwise recklessly, maliciously, and willfully owned,
21 entrusted, operated and/or controlled the Subject Aircraft in an
22 unsafe and dangerous manner in particulars to be determined
23 through discovery herein.

24 95. On May 5, 2019, as a direct and proximate result of the foregoing
25 reckless, malicious, and/or willful acts/omissions by Defendant, TVPX 2017 MSN
26 5043 BUSINESS TRUST, the Subject Aircraft was caused to and did experience an
27 inflight loss of airspeed and shortly thereafter entered an aerodynamic stall, followed
28 by a double engine failure and a rapid descent toward the ground, during which the
 pilots were unable to restart the engines, all of which further resulted in the Subject
 Aircraft violently crashing into the ground in the State of Coahuila, Mexico, causing
 all persons aboard to suffer fatal injuries, including Plaintiff Decedents, MANUEL
 ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA

1 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
 2 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
 3 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them.
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5 96. Prior to their deaths, Plaintiff Decedents MANUEL ALEJANDRO
 6 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
 7 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
 8 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
 9 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, were
 10 in good health and would have been capable of earning income. The Plaintiff Heirs,
 11 ANA MARÍA GONZÁLEZ-GÓMEZ, MANUEL SEPÚLVEDA-CRUZ, JUAN JOSÉ
 12 SALINAS ALMAGUER, LETICIA GUADALUPE TREVIÑO VILLAREAL, MARÍA
 13 FERNANDA INIESTRA-MEJÍA, BLANCA JANET MEJÍA-SÁNCHEZ, PEDRO,
 14 GABRIEL INIESTRA-GALLARDO, ALYANNA CAROLINA REYES-CISNEROS,
 15 SARA ALEJANDRA REYES-LUNA, VICTORIA REYES-CISNEROS, MARÍA DEL
 16 PILAR LARROSA-DELGADO, and each of them, and further next of kin of Plaintiff
 17 Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-
 18 TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-
 19 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
 20 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
 21 LUNA, and each of them, are entitled to the fair monetary value of the Plaintiff
 22 Decedents, including, but not limited to, compensation for the loss of the reasonably
 23 expected net income, loss of past and future earning capacity, loss of services,
 24 protections, care, assistance, society, companionship, comfort, guidance, counsel, and
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1 advice of the Plaintiff Decedents and to the reasonable medical, funeral, and burial
2 expenses incurred.

3 97. That, as a direct and proximate result of the reckless, malicious, and/or
4 willful acts/omissions of Defendant, TVPX 2017 MSN 5043 BUSINESS TRUST,
5 Plaintiffs and Plaintiff Decedents incurred general and special damages, including
6 but not limited to burial and funeral expenses, in excess of fifteen thousand dollars
7 (\$15,000.00); general and compensatory damages, including, but not limited to, great
8 pain of body and mind, disfigurement, mental anguish, shock and agony, pre-death
9 terror, loss of enjoyment of life, in excess of fifteen thousand dollars (\$15,000.00);
10 pecuniary damages in excess of fifteen thousand dollars (\$15,000.00).

11 98. That as a direct and proximate result of the aforementioned reckless,
12 malicious, and/or willful acts/omissions of Defendant, TVPX 2017 MSN 5043
13 BUSINESS TRUST, Plaintiffs may recover penalty and punitive damages that would
14 have recovered if Plaintiff Decedents have survived and that Plaintiffs have been
15 required to engage in the services of an attorney, incurring attorneys' fees and costs
16 to bring this action.

17 99. WHEREFORE, Plaintiff, CHRISTOPHER G. MEHNE, as Personal
18 Representative of the Estate of MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
19 deceased; ANA MARÍA GONZÁLEZ-GÓMEZ, as HEIR to the Decedent, MANUEL
20 ALEJANDRO SEPÚLVEDA-GONZÁLEZ, deceased; MANUEL SEPÚLVEDA-CRUZ,
21 as HEIR to the Decedent, MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
22 deceased; CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of
23 MÓNICA LETICIA SALINAS-TREVINO, deceased; JUAN JOSÉ SALINAS
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1 ALMAGUER, as HEIR to the Decedent, MÓNICA LETICIA SALINAS-TREVIÑO,
2 deceased; LETICIA GUADALUPE TREVIÑO VILLAREAL, as HEIR to the Decedent,
3 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; CHRISTOPHER G. MEHNE, as
4 Personal Representative to the Estate of ADRIANA MONSERRAT MEJÍA-
5 SÁNCHEZ, deceased; MARÍA FERNANDA INIESTRA-MEJÍA, as HEIR to the
6 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; BLANCA JANET
7 MEJÍA-SÁNCHEZ, as HEIR to the Decedent, ADRIANA MONSERRAT MEJÍA-
8 SÁNCHEZ, deceased; PEDRO GABRIEL INIESTRA-GALLARDO, as HEIR to the
9 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; CHRISTOPHER
10 G. MEHNE, as Personal Representative of the Estate of LUIS OCTAVIO REYES-
11 DOMÍNGUEZ, deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to
12 the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ, deceased; SARA ALEJANDRA
13 REYES-LUNA, as HEIR to the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ,
14 deceased; VICTORIA REYES-CISNEROS, as HEIR to the Decedent, LUIS OCTAVIO
15 REYES-DOMÍNGUEZ, deceased; CHRISTOPHER G. MEHNE, as Personal
16 Representative of the Estate of LOYDA LILIANA LUNA-LARROSA, deceased;
17 MARÍA DEL PILAR LARROSA-DELGADO, as HEIR to the Decedent, LOYDA
18 LILIANA LUNA-LARROSA, deceased; CHRISTOPHER G. MEHNE, as Personal
19 Representative of the Estate of JADE PAOLA-REYES-LUNA, deceased; ALYANNA
20 CAROLINA REYES-CISNEROS, as HEIR to the Decedent, JADE PAOLA REYES-
21 LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent,
22 JADE PAOLA REYES-LUNA, deceased; VICTORIA REYES-CISNEROS, as HEIR to
23 the Decedent, JADE PAOLA REYES-LUNA, deceased; CHRISTOPHER G. MEHNE,
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1 as Personal Representative of the Estate of GUILLERMO OCTAVIO REYES-LUNA,
2 deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent
3 GUILLERMO OCTAVIO REYES-LUNA, deceased; SARA ALEJANDRA REYES-
4 LUNA, as HEIR to the Decedent, GUILLERMO OCTAVIO REYES-LUNA, deceased;
5 VICTORIA REYES-CISNEROS, as HEIR to the Decedent, GUILLERMO OCTAVIO
6 REYES-LUNA, deceased; and CHRISTOPHER G. MEHNE, as Personal
7 Representative of the Estate of FRIDA ALEJANDRINA REYES-LUNA, deceased;
8 ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent, FRIDA
9 ALEJANDRINA REYES-LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as
10 HEIR to the Decedent, FRIDA ALEJANDRINA REYES-LUNA, deceased; VICTORIA
11 REYES-CISNEROS, as HEIR to the Decedent, FRIDA ALEJANDRINA REYES-
12 LUNA, deceased; and each of them, and each of them, demand judgment against
13 Defendant, TVPX AIRCRAFT SOLUTIONS, INC., together with interest, costs, and
14 fees.
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NINTH CAUSE OF ACTION
(Wrongful Death)

Plaintiffs v. TVPX 2017 MSN 5043 Business Trust

20 100. Plaintiffs repeat and reallege each and every allegation and fact
21 contained in this Complaint and incorporate the same herein by reference.

23 101. That the death of Plaintiff Decedents was caused or contributed by the
24 wrongful acts and/or negligence/gross negligence of Defendant, TVPX 2017 MSN 5043
25 BUSINESS TRUST

26 102. That, pursuant to NRS 41.085(2), “[w]hen the death of any person . . . is
27 caused by the wrongful act or neglect of another, the heirs of the decedent and
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1 personal representatives of the decedent may each maintain an action for damages
2 against the person(s) who caused the death."

3 103. That Plaintiff Personal Representative CHRISTOPHER G. MEHNE, as
4 Personal Representative of the Estates of Plaintiff Decedents, and each of them, is
5 entitled to maintain an action for damages against Defendant, TVPX 2017 MSN 5043
6 BUSINESS TRUST, for wrongful death, including, but not limited to, damages set
7 forth in NRS 41.085.

8 104. That Plaintiff Heirs are the natural heirs of Plaintiff Decedents and are
9 entitled to maintain an action for damages against Defendant, TVPX 2017 MSN 5043
10 BUSINESS TRUST, for wrongful death, including, but not limited to, damages set
11 forth in NRS 41.85.

12 105. On May 5, 2019, as a direct and proximate result of the foregoing
13 acts/omissions by Defendant, TVPX 2017 MSN 5043 BUSINESS TRUST, the Subject
14 Aircraft was caused to and did experience an inflight loss of airspeed and shortly
15 thereafter entered an aerodynamic stall, followed by a double engine failure and a
16 rapid descent toward the ground, during which the pilots were unable to restart the
17 engines, all of which further resulted in the Subject Aircraft violently crashing into
18 the ground in the State of Coahuila, Mexico, causing all persons aboard to suffer fatal
19 injuries, including Plaintiff Decedents, MANUEL ALEJANDRO SEPÚLVEDA-
20 GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA MONSERRAT MEJIA-
21 SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA LILIANA LUNA-
22 LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO REYES-LUNA,
23 and FRIDA ALEJANDRINA REYES-LUNA, and each of them.
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1 106. Prior to their deaths, Plaintiff Decedents MANUEL ALEJANDRO
 2 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
 3 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
 4 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
 5 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, were
 6 in good health and would have been capable of earning income. The Plaintiff Heirs,
 7 ANA MARÍA GONZÁLEZ-GÓMEZ, MANUEL SEPÚLVEDA-CRUZ, JUAN JOSÉ
 8 SALINAS ALMAGUER, LETICIA GUADALUPE TREVIÑO VILLAREAL, MARÍA
 9 FERNANDA INIESTRA-MEJÍA, BLANCA JANET MEJÍA-SÁNCHEZ, PEDRO,
 10 GABRIEL INIESTRA-GALLARDO, ALYANNA CAROLINA REYES-CISNEROS,
 11 SARA ALEJANDRA REYES-LUNA, VICTORIA REYES-CISNEROS, MARÍA DEL
 12 PILAR LARROSA-DELGADO, and each of them, and further next of kin of Plaintiff
 13 Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-
 14 TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-
 15 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
 16 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
 17 LUNA, and each of them, are entitled to the fair monetary value of the Plaintiff
 18 Decedents, including, but not limited to, compensation for the loss of the reasonably
 19 expected net income, loss of past and future earning capacity, loss of services,
 20 protections, care, assistance, society, companionship, comfort, guidance, counsel, and
 21 advice of the Plaintiff Decedents and to the reasonable medical, funeral, and burial
 22 expenses incurred.

23 107. That, as a direct and proximate result of the foregoing acts/omissions of
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1 Defendant, TVPX 2017 MSN 5043 BUSINESS TRUST, Plaintiffs and Plaintiff
 2 Decedents incurred general and special damages, including but not limited to burial
 3 and funeral expenses, in excess of fifteen thousand dollars (\$15,000.00); general and
 4 compensatory damages, including, but not limited to, great pain of body and mind,
 5 disfigurement, mental anguish, shock and agony, pre-death terror, loss of enjoyment
 6 of life, in excess of fifteen thousand dollars (\$15,000.00); pecuniary damages in excess
 7 of fifteen thousand dollars (\$15,000.00).

9 108. That as a direct and proximate result of the foregoing acts/omissions of
 10 Defendant, TVPX 2017 MSN 5043 BUSINESS TRUST, Plaintiffs may recover
 11 penalty and punitive damages that would have recovered if Plaintiff Decedents have
 12 survived and that Plaintiffs have been required to engage in the services of an
 13 attorney, incurring attorneys' fees and costs to bring this action.

15 109. WHEREFORE, Plaintiff, CHRISTOPHER G. MEHNE, as Personal
 16 Representative of the Estate of MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
 17 deceased; ANA MARÍA GONZÁLEZ-GÓMEZ, as HEIR to the Decedent, MANUEL
 18 ALEJANDRO SEPÚLVEDA-GONZÁLEZ, deceased; MANUEL SEPÚLVEDA-CRUZ,
 19 as HEIR to the Decedent, MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
 20 deceased; CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of
 21 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; JUAN JOSÉ SALINAS
 22 ALMAGUER, as HEIR to the Decedent, MÓNICA LETICIA SALINAS-TREVIÑO,
 23 deceased; LETICIA GUADALUPE TREVIÑO VILLAREAL, as HEIR to the Decedent,
 24 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; CHRISTOPHER G. MEHNE, as
 25 Personal Representative to the Estate of ADRIANA MONSERRAT MEJÍA-
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1 SÁNCHEZ, deceased; MARÍA FERNANDA INIESTRA-MEJÍA, as HEIR to the
2 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; BLANCA JANET
3 MEJÍA-SÁNCHEZ, as HEIR to the Decedent, ADRIANA MONSERRAT MEJÍA-
4 SÁNCHEZ, deceased; PEDRO GABRIEL INIESTRA-GALLARDO, as HEIR to the
5 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; CHRISTOPHER
6 G. MEHNE, as Personal Representative of the Estate of LUIS OCTAVIO REYES-
7 DOMÍNGUEZ, deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to
8 the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ, deceased; SARA ALEJANDRA
9 REYES-LUNA, as HEIR to the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ,
10 deceased; VICTORIA REYES-CISNEROS, as HEIR to the Decedent, LUIS OCTAVIO
11 REYES-DOMÍNGUEZ, deceased; CHRISTOPHER G. MEHNE, as Personal
12 Representative of the Estate of LOYDA LILIANA LUNA-LARROSA, deceased;
13 MARÍA DEL PILAR LARROSA-DELGADO, as HEIR to the Decedent, LOYDA
14 LILIANA LUNA-LARROSA, deceased; CHRISTOPHER G. MEHNE, as Personal
15 Representative of the Estate of JADE PAOLA-REYES-LUNA, deceased; ALYANNA
16 CAROLINA REYES-CISNEROS, as HEIR to the Decedent, JADE PAOLA REYES-
17 LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent,
18 JADE PAOLA REYES-LUNA, deceased; VICTORIA REYES-CISNEROS, as HEIR to
19 the Decedent, JADE PAOLA REYES-LUNA, deceased; CHRISTOPHER G. MEHNE,
20 as Personal Representative of the Estate of GUILLERMO OCTAVIO REYES-LUNA,
21 deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent
22 GUILLERMO OCTAVIO REYES-LUNA, deceased; SARA ALEJANDRA REYES-
23 LUNA, as HEIR to the Decedent, GUILLERMO OCTAVIO REYES-LUNA, deceased;
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1 VICTORIA REYES-CISNEROS, as HEIR to the Decedent, GUILLERMO OCTAVIO
 2 REYES-LUNA, deceased; and CHRISTOPHER G. MEHNE, as Personal
 3 Representative of the Estate of FRIDA ALEJANDRINA REYES-LUNA, deceased;
 4 ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent, FRIDA
 5 ALEJANDRINA REYES-LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as
 6 HEIR to the Decedent, FRIDA ALEJANDRINA REYES-LUNA, deceased; VICTORIA
 7 REYES-CISNEROS, as HEIR to the Decedent, FRIDA ALEJANDRINA REYES-
 8 LUNA, deceased; and each of them, and each of them, demand judgment against
 9 Defendant, TVPX 2017 MSN 5043 BUSINESS TRUST, together with interest, costs,
 10 and fees.

13 **TENTH CAUSE OF ACTION**

14 **(Negligence)**

15 **Plaintiffs v. Atlantic Aviation FBO, Inc.**

16 110. Plaintiffs repeat and reallege each and every allegation and fact
 17 contained in this Complaint and incorporate the same herein by reference.

18 111. On May 5, 2019, and at all times relevant, Defendant, ATLANTIC
 19 AVIATION FBO, INC., owed a duty to Plaintiff Decedents, MANUEL ALEJANDRO
 20 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
 21 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
 22 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
 23 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, to
 24 exercise ordinary care in the servicing and fueling of the Subject Aircraft, so as not
 25 cause injury to their persons.

26 112. On May 5, 2019, Defendant, ATLANTIC AVIATION FBO, INC.,
 27

1 individually and/or through its agents, breached its duty of care to Plaintiff
2 Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-
3 TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-
4 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
5 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
6 LUNA, and each of them, in one or more of the following particulars:

- 7
- 8 a) Negligently and carelessly failed to provide fuel of a proper and
9 adequate quality for the Subject Aircraft to safely conduct high
10 altitude operations within its certified maximum operating
11 altitude;
 - 12 b) Negligently and carelessly failed to provide proper and adequate
13 servicing of the Subject Aircraft and its components while the
14 Subject Aircraft was in Las Vegas from May 3, 2019 through May
15 5, 2019;
 - 16 c) It otherwise negligently and carelessly provided products and
17 services relating to the Subject Aircraft in particulars to be
18 determined through discovery herein.

19 113. On May 5, 2019, as a direct and proximate result of the foregoing breach
20 of duty by Defendant, ATLANTIC AVIATION FBO, INC., the Subject Aircraft was
21 caused to and did experience an inflight loss of airspeed and, shortly thereafter,
22 entered an aerodynamic stall, followed by a double engine failure and a rapid descent
23 toward the ground, during which the pilots were unable to restart the engines, all of
24 which further resulted in the Subject Aircraft violently crashing into the ground in
25 the State of Coahuila, Mexico, causing all persons aboard to suffer fatal injuries,
26 including Plaintiff Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ,
27 LETICIA SALINAS-TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS
28 OCTAVIO REYES-DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE

1 PAOLA REYES-LUNA, GUILLERMO OCTAVIO REYES-LUNA, and FRIDA
2 ALEJANDRINA REYES-LUNA, and each of them.

3 114. Prior to their deaths, Plaintiff Decedents, MANUEL ALEJANDRO
4 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
5 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
6 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
7 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, were
8 in good health and would have been capable of earning income. The Plaintiff Heirs,
9 ANA MARÍA GONZÁLEZ-GÓMEZ, MANUEL SEPÚLVEDA-CRUZ, JUAN JOSÉ
10 SALINAS ALMAGUER, LETICIA GUADALUPE TREVIÑO VILLAREAL, MARÍA
11 FERNANDA INIESTRA-MEJÍA, BLANCA JANET MEJÍA-SÁNCHEZ, PEDRO,
12 GABRIEL INIESTRA-GALLARDO, ALYANNA CAROLINA REYES-CISNEROS,
13 SARA ALEJANDRA REYES-LUNA, VICTORIA REYES-CISNEROS, MARÍA DEL
14 PILAR LARROSA-DELGADO, and each of them, and further next of kin of Plaintiff
15 Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-
16 TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-
17 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
18 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
19 LUNA, and each of them, are entitled to the fair monetary value of the Plaintiff
20 Decedents, including, but not limited to, compensation for the loss of the reasonably
21 expected net income, loss of past and future earning capacity, loss of services,
22 protections, care, assistance, society, companionship, comfort, guidance, counsel, and
23 advice of the Plaintiff Decedents and to the reasonable medical, funeral, and burial
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1 expenses incurred.

2 115. That, as a direct and proximate result of the negligent acts/omissions of
3 Defendant, ATLANTIC AVIATION FBO, INC., Plaintiffs and Plaintiff Decedents
4 incurred general and special damages in excess of fifteen thousand dollars
5 (\$15,000.00); general and compensatory damages, including, but not limited to, pre-
6 death great pain of body and mind, pre-death disfigurement, pre-death mental
7 anguish, pre-death shock and agony, pre-death terror, and loss of enjoyment of life, in
8 excess of fifteen thousand dollars (\$15,000.00); pecuniary damages in excess of fifteen
9 thousand dollars (\$15,000.00).

10 116. That as a direct and proximate result of the aforementioned negligence
11 of Defendant, ATLANTIC AVIATION FBO, INC., Plaintiffs may recover penalty and
12 punitive damages that would have recovered if Plaintiff Decedents have survived and
13 that Plaintiffs have been required to engage in the services of an attorney, incurring
14 attorneys' fees and costs to bring this action.

15 117. WHEREFORE, Plaintiff, CHRISTOPHER G. MEHNE, as Personal
16 Representative of the Estate of MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
17 deceased; ANA MARÍA GONZÁLEZ-GÓMEZ, as HEIR to the Decedent, MANUEL
18 ALEJANDRO SEPÚLVEDA-GONZÁLEZ, deceased; MANUEL SEPÚLVEDA-CRUZ,
19 as HEIR to the Decedent, MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
20 deceased; CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of
21 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; JUAN JOSÉ SALINAS
22 ALMAGUER, as HEIR to the Decedent, MÓNICA LETICIA SALINAS-TREVIÑO,
23 deceased; LETICIA GUADALUPE TREVIÑO VILLAREAL, as HEIR to the Decedent,
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1 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; CHRISTOPHER G. MEHNE, as
2 Personal Representative to the Estate of ADRIANA MONSERRAT MEJÍA-
3 SÁNCHEZ, deceased; MARÍA FERNANDA INIESTRA-MEJÍA, as HEIR to the
4 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; BLANCA JANET
5 MEJÍA-SÁNCHEZ, as HEIR to the Decedent, ADRIANA MONSERRAT MEJÍA-
6 SÁNCHEZ, deceased; PEDRO GABRIEL INIESTRA-GALLARDO, as HEIR to the
7 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; CHRISTOPHER
8 G. MEHNE, as Personal Representative of the Estate of LUIS OCTAVIO REYES-
9 DOMÍNGUEZ, deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to
10 the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ, deceased; SARA ALEJANDRA
11 REYES-LUNA, as HEIR to the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ,
12 deceased; VICTORIA REYES-CISNEROS, as HEIR to the Decedent, LUIS OCTAVIO
13 REYES-DOMÍNGUEZ, deceased; CHRISTOPHER G. MEHNE, as Personal
14 Representative of the Estate of LOYDA LILIANA LUNA-LARROSA, deceased;
15 MARÍA DEL PILAR LARROSA-DELGADO, as HEIR to the Decedent, LOYDA
16 LILIANA LUNA-LARROSA, deceased; CHRISTOPHER G. MEHNE, as Personal
17 Representative of the Estate of JADE PAOLA-REYES-LUNA, deceased; ALYANNA
18 CAROLINA REYES-CISNEROS, as HEIR to the Decedent, JADE PAOLA REYES-
19 LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent,
20 JADE PAOLA REYES-LUNA, deceased; VICTORIA REYES-CISNEROS, as HEIR to
21 the Decedent, JADE PAOLA REYES-LUNA, deceased; CHRISTOPHER G. MEHNE,
22 as Personal Representative of the Estate of GUILLERMO OCTAVIO REYES-LUNA,
23 deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent
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1 GUILLERMO OCTAVIO REYES-LUNA, deceased; SARA ALEJANDRA REYES-
2 LUNA, as HEIR to the Decedent, GUILLERMO OCTAVIO REYES-LUNA, deceased;
3 VICTORIA REYES-CISNEROS, as HEIR to the Decedent, GUILLERMO OCTAVIO
4 REYES-LUNA, deceased; and CHRISTOPHER G. MEHNE, as Personal
5 Representative of the Estate of FRIDA ALEJANDRINA REYES-LUNA, deceased;
6 ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent, FRIDA
7 ALEJANDRINA REYES-LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as
8 HEIR to the Decedent, FRIDA ALEJANDRINA REYES-LUNA, deceased; VICTORIA
9 REYES-CISNEROS, as HEIR to the Decedent, FRIDA ALEJANDRINA REYES-
10 LUNA, deceased; and each of them, and each of them, demand judgment against
11 Defendant, ATLANTIC AVIATION FBO, INC., together with interest, costs, and fees.
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ELEVENTH CAUSE OF ACTION
(Gross Negligence)

Gross Negligence

17 118. Plaintiffs repeat and reallege each and every allegation and fact
18 contained in this Complaint and incorporate the same herein by reference.

19 119. On May 5, 2019, and at all times relevant, Defendant, ATLANTIC
20 AVIATION FBO, INC., owed a duty to Plaintiff Decedents, MANUEL ALEJANDRO
21 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
22 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
23 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
24 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, to
25 exercise ordinary care in the servicing and fueling of the Subject Aircraft so as not
26 cause injury to their persons.
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1 120. On May 5, 2019, Defendant, ATLANTIC AVIATION FBO, INC.,
 2 individually and/or through its agents acted recklessly, maliciously, and willfully,
 3 whereupon Defendant, ATLANTIC AVIATION FBO, INC., breached its duty of care
 4 to Plaintiff Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA
 5 SALINAS-TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO
 6 REYES-DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-
 7 LUNA, GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA
 8 REYES-LUNA, and each of them, in one or more of the following particulars:
 9

- 10 a) Recklessly, maliciously, and willfully failed to provide fuel of a
 proper and adequate quality for the Subject Aircraft to safely
 conduct high altitude operations within its certified maximum
 operating altitude;
- 11 b) Recklessly, maliciously, and willfully failed to provide proper and
 adequate servicing of the Subject Aircraft and its components
 while the Subject Aircraft was in Las Vegas from May 3, 2019
 through May 5, 2019;
- 12 c) It otherwise recklessly, maliciously, and willfully provided
 products and services relating to the Subject Aircraft in
 particulars to be determined through discovery herein.

13 121. On May 5, 2019, as a direct and proximate result of the foregoing
 14 reckless, malicious, and/or willful acts/omissions by Defendant, ATLANTIC
 15 AVIATION FBO, INC., the Subject Aircraft was caused to and did experience an
 16 inflight loss of airspeed and shortly thereafter entered an aerodynamic stall, followed
 17 by a double engine failure and a rapid descent toward the ground, during which the
 18 pilots were unable to restart the engines, all of which further resulted in the Subject
 19 Aircraft violently crashing into the ground in the State of Coahuila, Mexico, causing
 20 all persons aboard to suffer fatal injuries, including Plaintiff Decedents, MANUEL
 21

1 ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
2 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
3 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
4 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them.
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6 122. Prior to their deaths, Plaintiff Decedents MANUEL ALEJANDRO
7 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
8 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
9 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
10 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, were
11 in good health and would have been capable of earning income. The Plaintiff Heirs,
12 ANA MARÍA GONZÁLEZ-GÓMEZ, MANUEL SEPÚLVEDA-CRUZ, JUAN JOSÉ
13 SALINAS ALMAGUER, LETICIA GUADALUPE TREVIÑO VILLAREAL, MARÍA
14 FERNANDA INIESTRA-MEJÍA, BLANCA JANET MEJÍA-SÁNCHEZ, PEDRO,
15 GABRIEL INIESTRA-GALLARDO, ALYANNA CAROLINA REYES-CISNEROS,
16 SARA ALEJANDRA REYES-LUNA, VICTORIA REYES-CISNEROS, MARÍA DEL
17 PILAR LARROSA-DELGADO, and each of them, and further next of kin of Plaintiff
18 Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-
19 TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-
20 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
21 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
22 LUNA, and each of them, are entitled to the fair monetary value of the Plaintiff
23 Decedents, including, but not limited to, compensation for the loss of the reasonably
24 expected net income, loss of past and future earning capacity, loss of services,
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1 protections, care, assistance, society, companionship, comfort, guidance, counsel, and
2 advice of the Plaintiff Decedents and to the reasonable medical, funeral, and burial
3 expenses incurred.
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5 123. That, as a direct and proximate result of the reckless, malicious, and/or
6 willful acts/omissions of Defendant, ATLANTIC AVIATION FBO, INC., Plaintiffs and
7 Plaintiff Decedents incurred general and special damages, including but not limited
8 to burial and funeral expenses, in excess of fifteen thousand dollars (\$15,000.00);
9 general and compensatory damages, including, but not limited to, great pain of body
10 and mind, disfigurement, mental anguish, shock and agony, pre-death terror, loss of
11 enjoyment of life, in excess of fifteen thousand dollars (\$15,000.00); pecuniary
12 damages in excess of fifteen thousand dollars (\$15,000.00).
13

14 124. That as a direct and proximate result of the aforementioned reckless,
15 malicious, and/or willful acts/omissions of Defendant, ATLANTIC AVIATION FBO,
16 INC., Plaintiffs may recover penalty and punitive damages that would have recovered
17 if Plaintiff Decedents have survived and that Plaintiffs have been required to engage
18 in the services of an attorney, incurring attorneys' fees and costs to bring this action.
19

20 125. WHEREFORE, Plaintiff, CHRISTOPHER G. MEHNE, as Personal
21 Representative of the Estate of MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
22 deceased; ANA MARÍA GONZÁLEZ-GÓMEZ, as HEIR to the Decedent, MANUEL
23 ALEJANDRO SEPÚLVEDA-GONZÁLEZ, deceased; MANUEL SEPÚLVEDA-CRUZ,
24 as HEIR to the Decedent, MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
25 deceased; CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of
26 MÓNICA LETICIA SALINAS-TREVÍNO, deceased; JUAN JOSÉ SALINAS
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1 ALMAGUER, as HEIR to the Decedent, MÓNICA LETICIA SALINAS-TREVIÑO,
2 deceased; LETICIA GUADALUPE TREVIÑO VILLAREAL, as HEIR to the Decedent,
3 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; CHRISTOPHER G. MEHNE, as
4 Personal Representative to the Estate of ADRIANA MONSERRAT MEJÍA-
5 SÁNCHEZ, deceased; MARÍA FERNANDA INIESTRA-MEJÍA, as HEIR to the
6 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; BLANCA JANET
7 MEJÍA-SÁNCHEZ, as HEIR to the Decedent, ADRIANA MONSERRAT MEJÍA-
8 SÁNCHEZ, deceased; PEDRO GABRIEL INIESTRA-GALLARDO, as HEIR to the
9 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; CHRISTOPHER
10 G. MEHNE, as Personal Representative of the Estate of LUIS OCTAVIO REYES-
11 DOMÍNGUEZ, deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to
12 the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ, deceased; SARA ALEJANDRA
13 REYES-LUNA, as HEIR to the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ,
14 deceased; VICTORIA REYES-CISNEROS, as HEIR to the Decedent, LUIS OCTAVIO
15 REYES-DOMÍNGUEZ, deceased; CHRISTOPHER G. MEHNE, as Personal
16 Representative of the Estate of LOYDA LILIANA LUNA-LARROSA, deceased;
17 MARÍA DEL PILAR LARROSA-DELGADO, as HEIR to the Decedent, LOYDA
18 LILIANA LUNA-LARROSA, deceased; CHRISTOPHER G. MEHNE, as Personal
19 Representative of the Estate of JADE PAOLA-REYES-LUNA, deceased; ALYANNA
20 CAROLINA REYES-CISNEROS, as HEIR to the Decedent, JADE PAOLA REYES-
21 LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent,
22 JADE PAOLA REYES-LUNA, deceased; VICTORIA REYES-CISNEROS, as HEIR to
23 the Decedent, JADE PAOLA REYES-LUNA, deceased; CHRISTOPHER G. MEHNE,
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1 as Personal Representative of the Estate of GUILLERMO OCTAVIO REYES-LUNA,
2 deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent
3 GUILLERMO OCTAVIO REYES-LUNA, deceased; SARA ALEJANDRA REYES-
4 LUNA, as HEIR to the Decedent, GUILLERMO OCTAVIO REYES-LUNA, deceased;
5 VICTORIA REYES-CISNEROS, as HEIR to the Decedent, GUILLERMO OCTAVIO
6 REYES-LUNA, deceased; and CHRISTOPHER G. MEHNE, as Personal
7 Representative of the Estate of FRIDA ALEJANDRINA REYES-LUNA, deceased;
8 ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent, FRIDA
9 ALEJANDRINA REYES-LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as
10 HEIR to the Decedent, FRIDA ALEJANDRINA REYES-LUNA, deceased; VICTORIA
11 REYES-CISNEROS, as HEIR to the Decedent, FRIDA ALEJANDRINA REYES-
12 LUNA, deceased; and each of them, and each of them, demand judgment against
13 Defendant, ATLANTIC AVIATION FBO, INC., together with interest, costs, and fees.
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15

TWELFTH CAUSE OF ACTION

(Wrongful Death)

Plaintiffs v. Atlantic Aviation FBO, Inc.

19 126. Plaintiffs repeat and reallege each and every allegation and fact
20 contained in this Complaint and incorporate the same herein by reference.

127. That the death of Plaintiff Decedents was caused or contributed by the
128
129 wrongful acts and/or negligence/gross negligence of Defendant, ATLANTIC
130 AVIATION FBO, INC.

25 128. That, pursuant to NRS 41.085(2), “[w]hen the death of any person . . . is
26 caused by the wrongful act or neglect of another, the heirs of the decedent and
27 personal representatives of the decedent may each maintain an action for damages

1 against the person(s) who caused the death.”

2 129. That Plaintiff Personal Representative CHRISTOPHER G. MEHNE, as
 3 Personal Representative of the Estates of Plaintiff Decedents, and each of them, is
 4 entitled to maintain an action for damages against Defendant, ATLANTIC
 5 AVIATION FBO, INC., for wrongful death, including, but not limited to, damages set
 6 forth in NRS 41.085.

7 130. That Plaintiff Heirs are the natural heirs of Plaintiff Decedents and are
 8 entitled to maintain an action for damages against Defendant, ATLANTIC
 9 AVIATION FBO, INC., for wrongful death, including, but not limited to, damages set
 10 forth in NRS 41.85.

11 131. On May 5, 2019, as a direct and proximate result of the foregoing
 12 acts/omissions by Defendant, ATLANTIC AVIATION FBO, INC., the Subject Aircraft
 13 was caused to and did experience an inflight loss of airspeed and shortly thereafter
 14 entered an aerodynamic stall, followed by a double engine failure and a rapid descent
 15 toward the ground, during which the pilots were unable to restart the engines, all of
 16 which further resulted in the Subject Aircraft violently crashing into the ground in
 17 the State of Coahuila, Mexico, causing all persons aboard to suffer fatal injuries,
 18 including Plaintiff Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ,
 19 LETICIA SALINAS-TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS
 20 OCTAVIO REYES-DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE
 21 PAOLA REYES-LUNA, GUILLERMO OCTAVIO REYES-LUNA, and FRIDA
 22 ALEJANDRINA REYES-LUNA, and each of them.

23 132. Prior to their deaths, Plaintiff Decedents MANUEL ALEJANDRO
 24

1 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
 2 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
 3 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
 4 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, were
 5 in good health and would have been capable of earning income. The Plaintiff Heirs,
 6 ANA MARÍA GONZÁLEZ-GÓMEZ, MANUEL SEPÚLVEDA-CRUZ, JUAN JOSÉ
 7 SALINAS ALMAGUER, LETICIA GUADALUPE TREVIÑO VILLAREAL, MARÍA
 8 FERNANDA INIESTRA-MEJÍA, BLANCA JANET MEJÍA-SÁNCHEZ, PEDRO,
 9 GABRIEL INIESTRA-GALLARDO, ALYANNA CAROLINA REYES-CISNEROS,
 10 SARA ALEJANDRA REYES-LUNA, VICTORIA REYES-CISNEROS, MARÍA DEL
 11 PILAR LARROSA-DELGADO, and each of them, and further next of kin of Plaintiff
 12 Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-
 13 TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-
 14 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
 15 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
 16 LUNA, and each of them, are entitled to the fair monetary value of the Plaintiff
 17 Decedents, including, but not limited to, compensation for the loss of the reasonably
 18 expected net income, loss of past and future earning capacity, loss of services,
 19 protections, care, assistance, society, companionship, comfort, guidance, counsel, and
 20 advice of the Plaintiff Decedents and to the reasonable medical, funeral, and burial
 21 expenses incurred.

22 133. That, as a direct and proximate result of the foregoing acts/omissions of
 23 Defendant, ATLANTIC AVIATION FBO, INC., Plaintiffs and Plaintiff Decedents
 24
 25

1 incurred general and special damages, including but not limited to burial and funeral
2 expenses, in excess of fifteen thousand dollars (\$15,000.00); general and
3 compensatory damages, including, but not limited to, great pain of body and mind,
4 disfigurement, mental anguish, shock and agony, pre-death terror, loss of enjoyment
5 of life, in excess of fifteen thousand dollars (\$15,000.00); pecuniary damages in excess
6 of fifteen thousand dollars (\$15,000.00).

8 134. That as a direct and proximate result of the foregoing acts/omissions of
9 Defendant, ATLANTIC AVIATION FBO, INC., Plaintiffs may recover penalty and
10 punitive damages that would have recovered if Plaintiff Decedents have survived and
11 that Plaintiffs have been required to engage in the services of an attorney, incurring
12 attorneys' fees and costs to bring this action.

14 135. WHEREFORE, Plaintiff, CHRISTOPHER G. MEHNE, as Personal
15 Representative of the Estate of MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
16 deceased; ANA MARÍA GONZÁLEZ-GÓMEZ, as HEIR to the Decedent, MANUEL
17 ALEJANDRO SEPÚLVEDA-GONZÁLEZ, deceased; MANUEL SEPÚLVEDA-CRUZ,
18 as HEIR to the Decedent, MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
19 deceased; CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of
20 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; JUAN JOSÉ SALINAS
21 ALMAGUER, as HEIR to the Decedent, MÓNICA LETICIA SALINAS-TREVIÑO,
22 deceased; LETICIA GUADALUPE TREVIÑO VILLAREAL, as HEIR to the Decedent,
23 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; CHRISTOPHER G. MEHNE, as
24 Personal Representative to the Estate of ADRIANA MONSERRAT MEJÍA-
25 SÁNCHEZ, deceased; MARÍA FERNANDA INIESTRA-MEJÍA, as HEIR to the
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1 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; BLANCA JANET
2 MEJÍA-SÁNCHEZ, as HEIR to the Decedent, ADRIANA MONSERRAT MEJÍA-
3 SÁNCHEZ, deceased; PEDRO GABRIEL INIESTRA-GALLARDO, as HEIR to the
4 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; CHRISTOPHER
5 G. MEHNE, as Personal Representative of the Estate of LUIS OCTAVIO REYES-
6 DOMÍNGUEZ, deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to
7 the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ, deceased; SARA ALEJANDRA
8 REYES-LUNA, as HEIR to the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ,
9 deceased; VICTORIA REYES-CISNEROS, as HEIR to the Decedent, LUIS OCTAVIO
10 REYES-DOMÍNGUEZ, deceased; CHRISTOPHER G. MEHNE, as Personal
11 Representative of the Estate of LOYDA LILIANA LUNA-LARROSA, deceased;
12 MARÍA DEL PILAR LARROSA-DELGADO, as HEIR to the Decedent, LOYDA
13 LILIANA LUNA-LARROSA, deceased; CHRISTOPHER G. MEHNE, as Personal
14 Representative of the Estate of JADE PAOLA-REYES-LUNA, deceased; ALYANNA
15 CAROLINA REYES-CISNEROS, as HEIR to the Decedent, JADE PAOLA REYES-
16 LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent,
17 JADE PAOLA REYES-LUNA, deceased; VICTORIA REYES-CISNEROS, as HEIR to
18 the Decedent, JADE PAOLA REYES-LUNA, deceased; CHRISTOPHER G. MEHNE,
19 as Personal Representative of the Estate of GUILLERMO OCTAVIO REYES-LUNA,
20 deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent
21 GUILLERMO OCTAVIO REYES-LUNA, deceased; SARA ALEJANDRA REYES-
22 LUNA, as HEIR to the Decedent, GUILLERMO OCTAVIO REYES-LUNA, deceased;
23 VICTORIA REYES-CISNEROS, as HEIR to the Decedent, GUILLERMO OCTAVIO
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REYES-LUNA, deceased; and CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of FRIDA ALEJANDRINA REYES-LUNA, deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent, FRIDA ALEJANDRINA REYES-LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent, FRIDA ALEJANDRINA REYES-LUNA, deceased; VICTORIA REYES-CISNEROS, as HEIR to the Decedent, FRIDA ALEJANDRINA REYES-LUNA, deceased; and each of them, and each of them, demand judgment against Defendant, ATLANTIC AVIATION FBO, INC., together with interest, costs, and fees.

THIRTEENTH CAUSE OF ACTION
(Negligence)

136. Plaintiffs repeat and reallege each and every allegation and fact contained in this Complaint and incorporate the same herein by reference.

137. On May 5, 2019, and at all times relevant, Defendant, NABOR BONILLA CALDERA, owed a duty to Plaintiff Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, to exercise ordinary care in the ownership, entrustment, operation, and control of the Subject Aircraft, so as not cause injury to their persons.

138. On May 5, 2019, Defendant, NABOR BONILLA CALDERA, individually and/or through his agents, servants, employees, and/or licensees, including, but not limited to the pilots of the Subject Aircraft, Juan Jose Aguilar Talavera and Luis

Ovidio Gonzalez Flores, and each of them, breached their duty of care to Plaintiff Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, in one or more of the following particulars:

- a) Negligently and carelessly failed to conduct proper and adequate pre-flight planning in Las Vegas prior to initiating the accident flight;
 - b) Negligently and carelessly failed to conduct proper and adequate pre-flight inspection and checks of the Subject Aircraft in Las Vegas prior to initiating the accident flight;
 - c) Negligently and carelessly operated the Subject Aircraft during the accident flight;
 - d) Negligently and carelessly failed to provide or ensure the provision of updates and supplements to flight manuals, maintenance manuals, airworthiness directives, service bulletins, and other publications and information necessary for the airworthiness and safe operation of the Subject Aircraft;
 - e) Negligently and carelessly operated the Subject Aircraft with pilots who lacked proper and adequate education, training, experience, and/or skills to pilot the Subject Aircraft in a safe manner;
 - f) Negligently and carelessly failed to provide and ensure proper and adequate training and certification of pilots permitted to operate the Subject Aircraft;
 - g) Negligently and carelessly maintained the Subject Aircraft;
 - h) Negligently and carelessly failed to provide and ensure proper and adequate training and certification of mechanics permitted to perform maintenance, repair and overhaul work on the Subject Aircraft, the subject engines, and other component parts of the Subject Aircraft; and/or

1 i) He otherwise negligently and carelessly owned, entrusted,
 2 operated and/or controlled the Subject Aircraft in an unsafe and
 3 dangerous manner in particulars to be determined through
 4 discovery herein.

5 139. On May 5, 2019, as a direct and proximate result of the foregoing breach
 6 of duty by Defendant, NABOR BONILLA CALDERA, the Subject Aircraft was caused
 7 to and did experience an inflight loss of airspeed and, shortly thereafter, entered an
 8 aerodynamic stall, followed by a double engine failure and a rapid descent toward the
 9 ground, during which the pilots were unable to restart the engines, all of which
 10 further resulted in the Subject Aircraft violently crashing into the ground in the State
 11 of Coahuila, Mexico, causing all persons aboard to suffer fatal injuries, including
 12 Plaintiff Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA
 13 SALINAS-TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO
 14 REYES-DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-
 15 LUNA, GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA
 16 REYES-LUNA, and each of them.

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 18 140. Prior to their deaths, Plaintiff Decedents, MANUEL ALEJANDRO
 19 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
 20 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
 21 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
 22 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, were
 23 in good health and would have been capable of earning income. The Plaintiff Heirs,
 24 ANA MARÍA GONZÁLEZ-GÓMEZ, MANUEL SEPÚLVEDA-CRUZ, JUAN JOSÉ
 25 SALINAS ALMAGUER, LETICIA GUADALUPE TREVIÑO VILLAREAL, MARÍA
 26 FERNANDA INIESTRA-MEJÍA, BLANCA JANET MEJÍA-SÁNCHEZ, PEDRO,

1 GABRIEL INIESTRA-GALLARDO, ALYANNA CAROLINA REYES-CISNEROS,
 2 SARA ALEJANDRA REYES-LUNA, VICTORIA REYES-CISNEROS, MARÍA DEL
 3 PILAR LARROSA-DELGADO, and each of them, and further next of kin of Plaintiff
 4 Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-
 5 TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-
 6 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
 7 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
 8 LUNA, and each of them, are entitled to the fair monetary value of the Plaintiff
 9 Decedents, including, but not limited to, compensation for the loss of the reasonably
 10 expected net income, loss of past and future earning capacity, loss of services,
 11 protections, care, assistance, society, companionship, comfort, guidance, counsel, and
 12 advice of the Plaintiff Decedents and to the reasonable medical, funeral, and burial
 13 expenses incurred.
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15 141. That, as a direct and proximate result of the negligent acts/omissions of
 16 Defendant, NABOR BONILLA CALDERA, Plaintiffs and Plaintiff Decedents
 17 incurred general and special damages in excess of fifteen thousand dollars
 18 (\$15,000.00); general and compensatory damages, including, but not limited to, pre-
 19 death great pain of body and mind, pre-death disfigurement, pre-death mental
 20 anguish, pre-death shock and agony, pre-death terror, and loss of enjoyment of life, in
 21 excess of fifteen thousand dollars (\$15,000.00); pecuniary damages in excess of fifteen
 22 thousand dollars (\$15,000.00).

23 142. That as a direct and proximate result of the aforementioned negligence
 24 of Defendant, NABOR BONILLA CALDERA, Plaintiffs may recover penalty and
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1 punitive damages that would have recovered if Plaintiff Decedents have survived and
2 that Plaintiffs have been required to engage in the services of an attorney, incurring
3 attorneys' fees and costs to bring this action.
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5 143. WHEREFORE, Plaintiff, CHRISTOPHER G. MEHNE, as Personal
6 Representative of the Estate of MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
7 deceased; ANA MARÍA GONZÁLEZ-GÓMEZ, as HEIR to the Decedent, MANUEL
8 ALEJANDRO SEPÚLVEDA-GONZÁLEZ, deceased; MANUEL SEPÚLVEDA-CRUZ,
9 as HEIR to the Decedent, MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
10 deceased; CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of
11 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; JUAN JOSÉ SALINAS
12 ALMAGUER, as HEIR to the Decedent, MÓNICA LETICIA SALINAS-TREVIÑO,
13 deceased; LETICIA GUADALUPE TREVIÑO VILLAREAL, as HEIR to the Decedent,
14 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; CHRISTOPHER G. MEHNE, as
15 Personal Representative to the Estate of ADRIANA MONSERRAT MEJÍA-
16 SÁNCHEZ, deceased; MARÍA FERNANDA INIESTRA-MEJÍA, as HEIR to the
17 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; BLANCA JANET
18 MEJÍA-SÁNCHEZ, as HEIR to the Decedent, ADRIANA MONSERRAT MEJÍA-
19 SÁNCHEZ, deceased; PEDRO GABRIEL INIESTRA-GALLARDO, as HEIR to the
20 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; CHRISTOPHER
21 G. MEHNE, as Personal Representative of the Estate of LUIS OCTAVIO REYES-
22 DOMÍNGUEZ, deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to
23 the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ, deceased; SARA ALEJANDRA
24 REYES-LUNA, as HEIR to the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ,
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1 deceased; VICTORIA REYES-CISNEROS, as HEIR to the Decedent, LUIS OCTAVIO
2 REYES-DOMÍNGUEZ, deceased; CHRISTOPHER G. MEHNE, as Personal
3 Representative of the Estate of LOYDA LILIANA LUNA-LARROSA, deceased;
4 MARÍA DEL PILAR LARROSA-DELGADO, as HEIR to the Decedent, LOYDA
5 LILIANA LUNA-LARROSA, deceased; CHRISTOPHER G. MEHNE, as Personal
6 Representative of the Estate of JADE PAOLA-REYES-LUNA, deceased; ALYANNA
7 CAROLINA REYES-CISNEROS, as HEIR to the Decedent, JADE PAOLA REYES-
8 LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent,
9 JADE PAOLA REYES-LUNA, deceased; VICTORIA REYES-CISNEROS, as HEIR to
10 the Decedent, JADE PAOLA REYES-LUNA, deceased; CHRISTOPHER G. MEHNE,
11 as Personal Representative of the Estate of GUILLERMO OCTAVIO REYES-LUNA,
12 deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent
13 GUILLERMO OCTAVIO REYES-LUNA, deceased; SARA ALEJANDRA REYES-
14 LUNA, as HEIR to the Decedent, GUILLERMO OCTAVIO REYES-LUNA, deceased;
15 VICTORIA REYES-CISNEROS, as HEIR to the Decedent, GUILLERMO OCTAVIO
16 REYES-LUNA, deceased; and CHRISTOPHER G. MEHNE, as Personal
17 Representative of the Estate of FRIDA ALEJANDRINA REYES-LUNA, deceased;
18 ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent, FRIDA
19 ALEJANDRINA REYES-LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as
20 HEIR to the Decedent, FRIDA ALEJANDRINA REYES-LUNA, deceased; VICTORIA
21 REYES-CISNEROS, as HEIR to the Decedent, FRIDA ALEJANDRINA REYES-
22 LUNA, deceased; and each of them, and each of them, demand judgment against
23 Defendant, NABOR BONILLA CALDERA, together with interest, costs, and fees.
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1 **FOURTEENTH CAUSE OF ACTION**
 2 **(Gross Negligence)**
 3 **Plaintiffs v. Nabor Bonilla Caldera**

4 144. Plaintiffs repeat and reallege each and every allegation and fact
 5 contained in this Complaint and incorporate the same herein by reference.

6 145. On May, 2019, and at all times relevant, Defendant, NABOR BONILLA
 7 CALDERA, owed a duty to Plaintiff Decedents, MANUEL ALEJANDRO
 8 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
 9 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
 10 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
 11 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, to
 12 exercise ordinary care in the ownership, entrustment, operation, and control of the
 13 Subject Aircraft so as not cause injury to their persons.

14 146. On May 5, 2019, Defendant, NABOR BONILLA CALDERA, individually
 15 and/or through his agents, servants, employees, and/or licensees, including, but not
 16 limited to the pilots of the Subject Aircraft, Juan Jose Aguilar Talavera and Luis
 17 Ovidio Gonzalez Flores, and each of them, acted recklessly, maliciously, and willfully,
 18 whereupon Defendant, NABOR BONILLA CALDERA, breached its duty of care to
 19 Plaintiff Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA
 20 SALINAS-TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO
 21 REYES-DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-
 22 LUNA, GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA
 23 REYES-LUNA, and each of them, in one or more of the following particulars:

24 a) Recklessly, maliciously, and willfully failed to conduct proper and
 25 adequate pre-flight planning in Las Vegas prior to initiating the

- 1 accident flight;
- 2 b) Recklessly, maliciously, and willfully failed to conduct proper and
3 adequate pre-flight inspection and checks of the Subject Aircraft
4 in Las Vegas prior to initiating the accident flight;
- 5 c) Recklessly, maliciously, and willfully operated the Subject
6 Aircraft during the accident flight;
- 7 d) Recklessly, maliciously, and willfully failed to provide or ensure
8 the provision of updates and supplements to flight manuals,
9 maintenance manuals, airworthiness directives, service bulletins,
10 and other publications and information necessary for the
11 airworthiness and safe operation of the Subject Aircraft;
- 12 e) Recklessly, maliciously, and willfully operated the Subject
13 Aircraft with pilots who lacked proper and adequate education,
14 training, experience, and/or skills to pilot the Subject Aircraft in a
15 safe manner;
- 16 f) Recklessly, maliciously, and willfully failed to provide and ensure
17 proper and adequate training and certification of pilots permitted
18 to operate the Subject Aircraft;
- 19 g) Recklessly, maliciously, and willfully maintained the Subject
20 Aircraft;
- 21 h) Recklessly, maliciously, and willfully failed to provide and ensure
22 proper and adequate training and certification of mechanics
23 permitted to perform maintenance, repair and overhaul work on
24 the Subject Aircraft, the subject engines, and other component
25 parts of the Subject Aircraft; and/or
- 26 i) He otherwise recklessly, maliciously, and willfully owned,
27 entrusted, operated and/or controlled the Subject Aircraft in an
28 unsafe and dangerous manner in particulars to be determined
through discovery herein.

24 147. On May 5, 2019, as a direct and proximate result of the foregoing
25 reckless, malicious, and/or willful acts/omissions by Defendant, NABOR BONILLA
26 CALDERA, the Subject Aircraft was caused to and did experience an inflight loss of
27 airspeed and shortly thereafter entered an aerodynamic stall, followed by a double
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1 engine failure and a rapid descent toward the ground, during which the pilots were
 2 unable to restart the engines, all of which further resulted in the Subject Aircraft
 3 violently crashing into the ground in the State of Coahuila, Mexico, causing all
 4 persons aboard to suffer fatal injuries, including Plaintiff Decedents, MANUEL
 5 ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
 6 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
 7 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
 8 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them.
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10 148. Prior to their deaths, Plaintiff Decedents MANUEL ALEJANDRO
 11 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
 12 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
 13 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
 14 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, were
 15 in good health and would have been capable of earning income. The Plaintiff Heirs,
 16 ANA MARÍA GONZÁLEZ-GÓMEZ, MANUEL SEPÚLVEDA-CRUZ, JUAN JOSÉ
 17 SALINAS ALMAGUER, LETICIA GUADALUPE TREVIÑO VILLAREAL, MARÍA
 18 FERNANDA INIESTRA-MEJÍA, BLANCA JANET MEJÍA-SÁNCHEZ, PEDRO,
 19 GABRIEL INIESTRA-GALLARDO, ALYANNA CAROLINA REYES-CISNEROS,
 20 SARA ALEJANDRA REYES-LUNA, VICTORIA REYES-CISNEROS, MARÍA DEL
 21 PILAR LARROSA-DELGADO, and each of them, and further next of kin of Plaintiff
 22 Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-
 23 TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-
 24 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
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1 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
 2 LUNA, and each of them, are entitled to the fair monetary value of the Plaintiff
 3 Decedents, including, but not limited to, compensation for the loss of the reasonably
 4 expected net income, loss of past and future earning capacity, loss of services,
 5 protections, care, assistance, society, companionship, comfort, guidance, counsel, and
 6 advice of the Plaintiff Decedents and to the reasonable medical, funeral, and burial
 7 expenses incurred.

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 9 149. That, as a direct and proximate result of the reckless, malicious, and/or
 10 willful acts/omissions of Defendant, NABOR BONILLA CALDERA, Plaintiffs and
 11 Plaintiff Decedents incurred general and special damages, including but not limited
 12 to burial and funeral expenses, in excess of fifteen thousand dollars (\$15,000.00);
 13 general and compensatory damages, including, but not limited to, great pain of body
 14 and mind, disfigurement, mental anguish, shock and agony, pre-death terror, loss of
 15 enjoyment of life, in excess of fifteen thousand dollars (\$15,000.00); pecuniary
 16 damages in excess of fifteen thousand dollars (\$15,000.00).

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 18 150. That as a direct and proximate result of the aforementioned reckless,
 19 malicious, and/or willful acts/omissions of Defendant, NABOR BONILLA CALDERA,
 20 Plaintiffs may recover penalty and punitive damages that would have recovered if
 21 Plaintiff Decedents have survived and that Plaintiffs have been required to engage in
 22 the services of an attorney, incurring attorneys' fees and costs to bring this action.

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 24 151. WHEREFORE, Plaintiff, CHRISTOPHER G. MEHNE, as Personal
 25 Representative of the Estate of MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
 26 deceased; ANA MARÍA GONZÁLEZ-GÓMEZ, as HEIR to the Decedent, MANUEL
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1 ALEJANDRO SEPÚLVEDA-GONZÁLEZ, deceased; MANUEL SEPÚLVEDA-CRUZ,
2 as HEIR to the Decedent, MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
3 deceased; CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of
4 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; JUAN JOSÉ SALINAS
5 ALMAGUER, as HEIR to the Decedent, MÓNICA LETICIA SALINAS-TREVIÑO,
6 deceased; LETICIA GUADALUPE TREVIÑO VILLAREAL, as HEIR to the Decedent,
7 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; CHRISTOPHER G. MEHNE, as
8 Personal Representative to the Estate of ADRIANA MONSERRAT MEJÍA-
9 SÁNCHEZ, deceased; MARÍA FERNANDA INIESTRA-MEJÍA, as HEIR to the
10 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; BLANCA JANET
11 MEJÍA-SÁNCHEZ, as HEIR to the Decedent, ADRIANA MONSERRAT MEJÍA-
12 SÁNCHEZ, deceased; PEDRO GABRIEL INIESTRA-GALLARDO, as HEIR to the
13 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; CHRISTOPHER
14 G. MEHNE, as Personal Representative of the Estate of LUIS OCTAVIO REYES-
15 DOMÍNGUEZ, deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to
16 the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ, deceased; SARA ALEJANDRA
17 REYES-LUNA, as HEIR to the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ,
18 deceased; VICTORIA REYES-CISNEROS, as HEIR to the Decedent, LUIS OCTAVIO
19 REYES-DOMÍNGUEZ, deceased; CHRISTOPHER G. MEHNE, as Personal
20 Representative of the Estate of LOYDA LILIANA LUNA-LARROSA, deceased;
21 MARÍA DEL PILAR LARROSA-DELGADO, as HEIR to the Decedent, LOYDA
22 LILIANA LUNA-LARROSA, deceased; CHRISTOPHER G. MEHNE, as Personal
23 Representative of the Estate of JADE PAOLA-REYES-LUNA, deceased; ALYANNA
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1 CAROLINA REYES-CISNEROS, as HEIR to the Decedent, JADE PAOLA REYES-
 2 LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent,
 3 JADE PAOLA REYES-LUNA, deceased; VICTORIA REYES-CISNEROS, as HEIR to
 4 the Decedent, JADE PAOLA REYES-LUNA, deceased; CHRISTOPHER G. MEHNE,
 5 as Personal Representative of the Estate of GUILLERMO OCTAVIO REYES-LUNA,
 6 deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent
 7 GUILLERMO OCTAVIO REYES-LUNA, deceased; SARA ALEJANDRA REYES-
 8 LUNA, as HEIR to the Decedent, GUILLERMO OCTAVIO REYES-LUNA, deceased;
 9 VICTORIA REYES-CISNEROS, as HEIR to the Decedent, GUILLERMO OCTAVIO
 10 REYES-LUNA, deceased; and CHRISTOPHER G. MEHNE, as Personal
 11 Representative of the Estate of FRIDA ALEJANDRINA REYES-LUNA, deceased;
 12 ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent, FRIDA
 13 ALEJANDRINA REYES-LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as
 14 HEIR to the Decedent, FRIDA ALEJANDRINA REYES-LUNA, deceased; VICTORIA
 15 REYES-CISNEROS, as HEIR to the Decedent, FRIDA ALEJANDRINA REYES-
 16 LUNA, deceased; and each of them, and each of them, demand judgment against
 17 Defendant, NABOR BONILLA CALDERA, together with interest, costs, and fees.
 18

19 **FIFTEENTH CAUSE OF ACTION**
 20 **(Wrongful Death)**
 21 **Plaintiffs v. Nabor Bonilla Caldera**
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23 152. Plaintiffs repeat and reallege each and every allegation and fact
 24 contained in this Complaint and incorporate the same herein by reference.
 25

26 153. That the death of Plaintiff Decedents was caused or contributed by the
 27 wrongful acts and/or negligence/gross negligence of Defendant, NABOR BONILLA
 28

1 CALDERA

2 154. That, pursuant to NRS 41.085(2), “[w]hen the death of any person . . . is
3 caused by the wrongful act or neglect of another, the heirs of the decedent and
4 personal representatives of the decedent may each maintain an action for damages
5 against the person(s) who caused the death.”

6 155. That Plaintiff Personal Representative CHRISTOPHER G. MEHNE, as
7 Personal Representative of the Estates of Plaintiff Decedents, and each of them, is
8 entitled to maintain an action for damages against Defendant, NABOR BONILLA
9 CALDERA, for wrongful death, including, but not limited to, damages set forth in
10 NRS 41.085.

11 156. That Plaintiff Heirs are the natural heirs of Plaintiff Decedents and are
12 entitled to maintain an action for damages against Defendant, NABOR BONILLA
13 CALDERA, for wrongful death, including, but not limited to, damages set forth in
14 NRS 41.85.

15 157. On May 5, 2019, as a direct and proximate result of the foregoing
16 acts/omissions by Defendant, NABOR BONILLA CALDERA, the Subject Aircraft was
17 caused to and did experience an inflight loss of airspeed and shortly thereafter
18 entered an aerodynamic stall, followed by a double engine failure and a rapid descent
19 toward the ground, during which the pilots were unable to restart the engines, all of
20 which further resulted in the Subject Aircraft violently crashing into the ground in
21 the State of Coahuila, Mexico, causing all persons aboard to suffer fatal injuries,
22 including Plaintiff Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ,
23 LETICIA SALINAS-TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS
24

1 OCTAVIO REYES-DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE
 2 PAOLA REYES-LUNA, GUILLERMO OCTAVIO REYES-LUNA, and FRIDA
 3 ALEJANDRINA REYES-LUNA, and each of them.
 4

5 158. Prior to their deaths, Plaintiff Decedents MANUEL ALEJANDRO
 6 SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-TREVIÑO, ADRIANA
 7 MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-DOMINGUEZ, LOYDA
 8 LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA, GUILLERMO OCTAVIO
 9 REYES-LUNA, and FRIDA ALEJANDRINA REYES-LUNA, and each of them, were
 10 in good health and would have been capable of earning income. The Plaintiff Heirs,
 11 ANA MARÍA GONZÁLEZ-GÓMEZ, MANUEL SEPÚLVEDA-CRUZ, JUAN JOSÉ
 12 SALINAS ALMAGUER, LETICIA GUADALUPE TREVIÑO VILLAREAL, MARÍA
 13 FERNANDA INIESTRA-MEJÍA, BLANCA JANET MEJÍA-SÁNCHEZ, PEDRO,
 14 GABRIEL INIESTRA-GALLARDO, ALYANNA CAROLINA REYES-CISNEROS,
 15 SARA ALEJANDRA REYES-LUNA, VICTORIA REYES-CISNEROS, MARÍA DEL
 16 PILAR LARROSA-DELGADO, and each of them, and further next of kin of Plaintiff
 17 Decedents, MANUEL ALEJANDRO SEPÚLVEDA-GONZALEZ, LETICIA SALINAS-
 18 TREVIÑO, ADRIANA MONSERRAT MEJIA-SANCHEZ, LUIS OCTAVIO REYES-
 19 DOMINGUEZ, LOYDA LILIANA LUNA-LARROSA, JADE PAOLA REYES-LUNA,
 20 GUILLERMO OCTAVIO REYES-LUNA, and FRIDA ALEJANDRINA REYES-
 21 LUNA, and each of them, are entitled to the fair monetary value of the Plaintiff
 22 Decedents, including, but not limited to, compensation for the loss of the reasonably
 23 expected net income, loss of past and future earning capacity, loss of services,
 24 protections, care, assistance, society, companionship, comfort, guidance, counsel, and
 25
 26
 27
 28

1 advice of the Plaintiff Decedents and to the reasonable medical, funeral, and burial
2 expenses incurred.

3 159. That, as a direct and proximate result of the foregoing acts/omissions of
4 Defendant, NABOR BONILLA CALDERA, Plaintiffs and Plaintiff Decedents
5 incurred general and special damages, including but not limited to burial and funeral
6 expenses, in excess of fifteen thousand dollars (\$15,000.00); general and
7 compensatory damages, including, but not limited to, great pain of body and mind,
8 disfigurement, mental anguish, shock and agony, pre-death terror, loss of enjoyment
9 of life, in excess of fifteen thousand dollars (\$15,000.00); pecuniary damages in excess
10 of fifteen thousand dollars (\$15,000.00).

13 160. That as a direct and proximate result of the foregoing acts/omissions of
14 Defendant, NABOR BONILLA CALDERA, Plaintiffs may recover penalty and
15 punitive damages that would have recovered if Plaintiff Decedents have survived and
16 that Plaintiffs have been required to engage in the services of an attorney, incurring
17 attorneys' fees and costs to bring this action.

19 161. WHEREFORE, Plaintiff, CHRISTOPHER G. MEHNE, as Personal
20 Representative of the Estate of MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
21 deceased; ANA MARÍA GONZÁLEZ-GÓMEZ, as HEIR to the Decedent, MANUEL
22 ALEJANDRO SEPÚLVEDA-GONZÁLEZ, deceased; MANUEL SEPÚLVEDA-CRUZ,
23 as HEIR to the Decedent, MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ,
24 deceased; CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of
25 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; JUAN JOSÉ SALINAS
26 ALMAGUER, as HEIR to the Decedent, MÓNICA LETICIA SALINAS-TREVIÑO,
27
28

1 deceased; LETICIA GUADALUPE TREVIÑO VILLAREAL, as HEIR to the Decedent,
2 MÓNICA LETICIA SALINAS-TREVIÑO, deceased; CHRISTOPHER G. MEHNE, as
3 Personal Representative to the Estate of ADRIANA MONSERRAT MEJÍA-
4 SÁNCHEZ, deceased; MARÍA FERNANDA INIESTRA-MEJÍA, as HEIR to the
5 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; BLANCA JANET
6 MEJÍA-SÁNCHEZ, as HEIR to the Decedent, ADRIANA MONSERRAT MEJÍA-
7 SÁNCHEZ, deceased; PEDRO GABRIEL INIESTRA-GALLARDO, as HEIR to the
8 Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; CHRISTOPHER
9 G. MEHNE, as Personal Representative of the Estate of LUIS OCTAVIO REYES-
10 DOMÍNGUEZ, deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to
11 the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ, deceased; SARA ALEJANDRA
12 REYES-LUNA, as HEIR to the Decedent, LUIS OCTAVIO REYES-DOMÍNGUEZ,
13 deceased; VICTORIA REYES-CISNEROS, as HEIR to the Decedent, LUIS OCTAVIO
14 REYES-DOMÍNGUEZ, deceased; CHRISTOPHER G. MEHNE, as Personal
15 Representative of the Estate of LOYDA LILIANA LUNA-LARROSA, deceased;
16 MARÍA DEL PILAR LARROSA-DELGADO, as HEIR to the Decedent, LOYDA
17 LILIANA LUNA-LARROSA, deceased; CHRISTOPHER G. MEHNE, as Personal
18 Representative of the Estate of JADE PAOLA-REYES-LUNA, deceased; ALYANNA
19 CAROLINA REYES-CISNEROS, as HEIR to the Decedent, JADE PAOLA REYES-
20 LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent,
21 JADE PAOLA REYES-LUNA, deceased; VICTORIA REYES-CISNEROS, as HEIR to
22 the Decedent, JADE PAOLA REYES-LUNA, deceased; CHRISTOPHER G. MEHNE,
23 as Personal Representative of the Estate of GUILLERMO OCTAVIO REYES-LUNA,
24
25
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28

1 deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent
2 GUILLERMO OCTAVIO REYES-LUNA, deceased; SARA ALEJANDRA REYES-
3 LUNA, as HEIR to the Decedent, GUILLERMO OCTAVIO REYES-LUNA, deceased;
4 VICTORIA REYES-CISNEROS, as HEIR to the Decedent, GUILLERMO OCTAVIO
5 REYES-LUNA, deceased; and CHRISTOPHER G. MEHNE, as Personal
6 Representative of the Estate of FRIDA ALEJANDRINA REYES-LUNA, deceased;
7 ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent, FRIDA
8 ALEJANDRINA REYES-LUNA, deceased; SARA ALEJANDRA REYES-LUNA, as
9 HEIR to the Decedent, FRIDA ALEJANDRINA REYES-LUNA, deceased; VICTORIA
10 REYES-CISNEROS, as HEIR to the Decedent, FRIDA ALEJANDRINA REYES-
11 LUNA, deceased; and each of them, and each of them, demand judgment against
12 Defendant, NABOR BONILLA CALDERA, together with interest, costs, and fees.
13
14

PRAYER FOR RELIEF

17 WHEREFORE, Plaintiffs, reserving their right to amend this Complaint at or
18 prior to the time of trial to include all items of damages not yet ascertained, pray for
19 judgment against Defendants, and each of them, as follows:

- 20 1. For Special Damages, including, but not limited to, Plaintiffs' pre-death
21 damages and post-death damages, including funeral expenses, in an
22 amount in excess of \$15,000.00;

23 2. For general damages in an amount in excess of \$15,000;

24 3. For Pecuniary Damages, including, but not limited to, Plaintiffs' grief,
25 sorrow, loss of probable support, loss of companionship, loss of society,
26 loss of comfort and consortium in an amount excess of \$15,000.00;

27 4. For Penalty damages that might have been recovered if the Decedents
 had lived in an amount in excess of \$15,000.00;

- 1 5. For compensatory damages in an amount in excess of \$15,000.00;
- 2 6. For damages for conscious pain, suffering, pre-death terror,
3 disfigurement, mental anguish, and loss of enjoyment of life of the
4 Plaintiff Decedents in an amount in excess of \$15,000;
- 5 7. For damages for Wrongful Death in an amount in excess of \$15,000;
- 6 8. All other damages enumerated within NRS § 41.085 for each of the
7 Plaintiff Decedents' Estates and their Heirs, in an amount in excess of
8 \$15,000.00;
- 9 9. For attorneys' fees and costs;
- 10 10. For prejudgment and post-judgment interest; and
- 11 11. For such other further relief as this Honorable Court deems just and
12 proper.

13 DATED this 4th day of May, 2021.

14

15 **BROWN MISHLER, PLLC**

16

17 /s/ William H. Brown
One of the Attorneys for Plaintiffs

18

19 **WILLIAM H. BROWN**
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F: 214.361.5802
Attorneys for Plaintiffs

EXHIBIT “B”

EXHIBIT “B”

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CASE NO: A-21-833999-C
 Department 29

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 18 T: 702.816.2200
 F: 702.385.2899
Local Counsel for Plaintiffs

20 DISTRICT COURT

21 CLARK COUNTY, NEVADA

23 CHRISTOPHER G. MEHNE, as
 24 Personal Representative of the Estate
 of MANUEL ALEJANDRO
 25 SEPÚLVEDA-GONZÁLEZ, deceased;
 ANA MARÍA GONZÁLEZ-GÓMEZ,
 26 as HEIR to the Decedent. MANUEL
 ALEJANDRO SEPULVEDA-
 27 GONZALEZ, deceased; MANUEL
 SEPULVEDA-CRUZ, as HEIR to the
 28 Decedent MANUEL ALEJANDRO
 SEPULVEDA-GONZÁLEZ, deceased;

CASE NO. _____

DEPT. NO. _____

1 CHRISTOPHER G. MEHNE, as
2 Personal Representative of the Estate
3 of MÓNICA LETICIA SALINAS-
4 TREVIÑO, deceased; JUAN JOSÉ
5 SALINAS ALMAGUER, as HEIR to
the Decedent. MÓNICA LETICIA
6 SALINAS-TREVIÑO, deceased;
7 LETICIA GUADALUPE TREVIÑO
VILLAREAL, as HEIR to the
Decedent. MÓNICA LETICIA
8 SALINAS-TREVIÑO, deceased;
9
10 CHRISTOPHER G. MEHNE, as
Personal Representative of the Estate
of ADRIANA MONSERRAT MEJÍA-
SÁNCHEZ, deceased; MARÍA
FERNANDA INIESTRA-MEJÍA, as
HEIR to the Decedent. ADRIANA
MONSERRAT MEJÍA-SÁNCHEZ,
deceased; BLANCA JANET MEJÍA-
SÁNCHEZ, as HEIR to the Decedent,
ADRIANA MONSERRAT MEJÍA-
SÁNCHEZ, deceased; PEDRO
GABRIEL INIESTRA-GALLARDO,
as HEIR to the Decedent, ADRIANA
MONSERRAT MEJÍA-SÁNCHEZ,
deceased;
11
12 CHRISTOPHER G. MEHNE, as
Personal Representative of the Estate
of LUIS OCTAVIO REYES-
DOMÍNGUEZ, deceased; ALYANNA
CAROLINA REYES-CISNEROS, as
HEIR to the Decedent. LUIS
OCTAVIO REYES-DOMÍNGUEZ,
deceased; SARA ALEJANDRA
REYES-LUNA, as HEIR to the
Decedent. LUIS OCTAVIO REYES-
DOMÍNGUEZ, deceased; VICTORIA
REYES-CISNEROS, as HEIR to the
Decedent. LUIS OCTAVIO REYES-
DOMÍNGUEZ, deceased;
13
14 CHRISTOPHER G. MEHNE, as
Personal Representative of the Estate
of LOYDA LILIANA LUNA-
LORROSA, deceased; MARÍA DEL
PILAR LARROSA-DELGADO, as
HEIR to the Decedent. LOYDA
LILIANA LUNA-LARROSA,
deceased;
15
16 CHRISTOPHER G. MEHNE, as
Personal Representative of the Estate
of JADE PAOLA REYES-LUNA.

1 deceased: ALYANNA CAROLINA
2 REYES-CISNEROS, as HEIR to the
3 Decedent. JADE PAOLA REYES-
4 LUNA, deceased: SARA
5 ALEJANDRA REYES-LUNA, as
6 HEIR to the Decedent. JADE PAOLA
7 REYES-LUNA, deceased: VICTORIA
8 REYES-CISNEROS, as HEIR to the
9 Decedent. JADE PAOLA REYES-
10 LUNA, deceased;

11 CHRISTOPHER G. MEHNE, as
12 Personal Representative of the Estate
13 of GUILLERMO OCTAVIO REYES-
14 LUNA, deceased: ALYANNA
15 CAROLINAREYES-CISNEROS, as
16 HEIR to the Decedent. GUILLERMO
17 OCTAVIO REYES-LUNA, deceased:
18 SARA ALEJANDRA REYES-LUNA,
19 as HEIR to the Decedent.
GUILLERMO OCTAVIO REYES-
LUNA, deceased: VICTORIA REYES-
CISNEROS, as HEIR to the
Decedent. GUILLERMO OCTAVIO
REYES-LUNA, deceased; and

20 CHRISTOPHER G. MEHNE, as
21 Personal Representative of the
22 Estate of FRIDA ALEJANDRINA
23 REYES-LUNA, deceased;
24 ALYANNA CAROLINA REYES-
25 CISNEROS, as HEIR to the
26 Decedent, FRIDA ALEJANDRINA
27 REYES-LUNA, deceased; SARA
28 ALEJANDRA REYES-LUNA, as
HEIR to the Decedent, FRIDA
ALEJANDRINA REYES-LUNA,
deceased; VICTORIA REYES-
CISNEROS, as HEIR to the
Decedent, FRIDA ALEJANDRINA
REYES-LUNA, deceased,

29 Plaintiff(s),

30 -vs-

31 TVPX AIRCRAFT SOLUTIONS,
32 INC.; COMPAÑÍA DE AVIACIÓN Y

1 LOGISTICA EMPRESARIAL S.A.
 2 DE C.V.; TVPX 2017 MSN 5043
 3 BUSINESS TRUST; ATLANTIC
 4 AVIATION FBO, INC., and NABOR
 BONILLA CALDERA,

5 Defendant(s).
 6

7 **INITIAL APPEARANCE FEE DISCLOSURE (NRS CHAPTER 19)**

8 Pursuant to NRS Chapter 19, as amended by Senate Bill 106, filing
 9 fees are submitted for parties appearing in the above entitled action as
 10 indicated below:

New Complaint Fee	1 st Appearance Fee
<input type="checkbox"/> \$1530 <input type="checkbox"/> \$520 <input type="checkbox"/> \$299 <input checked="" type="checkbox"/> \$270.00	<input type="checkbox"/> \$1483.00 <input type="checkbox"/> \$473.00 <input type="checkbox"/> \$223.00

15 Name: CHRISTOPHER G. MEHNE, as
 16 Personal Representative of the Estate of
 17 MANUEL ALEJANDRO SEPÚLVEDA-
 GONZÁLEZ, deceased

18 ANA MARÍA GONZÁLEZ-GÓMEZ, as \$30
 19 HEIR to the Decedent, MANUEL
 20 ALEJANDRO SEPÚLVEDA-
 GONZÁLEZ, deceased

21 MANUEL SEPÚLVEDA-CRUZ, as \$30
 22 HEIR to the Decedent MANUEL
 23 ALEJANDRO SEPÚLVEDA-
 GONZÁLEZ, deceased

24 CHRISTOPHER G. MEHNE, as \$30
 25 Personal Representative of the Estate of
 MÓNICA LETICIA SALINAS-
 TREVINO, deceased

26 JUAN JOSÉ SALINAS ALMAGUER, as \$30
 27 HEIR to the Decedent, MÓNICA
 28 LETICIA SALINAS-TREVINO,
 deceased

Total of Continuation Sheet Attached \$810

TOTAL REMITTED: (Required) **Total Paid** **\$ 1080**

DATED this 4th day of May, 2021.

/s/ William H. Brown

William H. Brown (7623)

1 **INITIAL APPEARANCE FEE CONTINUATION SHEET:**

2 List names of additional parties (plaintiff or defendant) and the appropriate fees below:

3 LETICIA GUADALUPE TREVIÑO VILLAREAL, as HEIR to the	\$30
4 Decedent, MÓNICA LETICIA SALINAS-TREVIÑO, deceased	
5 CHRISTOPHER G. MEHNE, as Personal Representative of the	\$30
6 Estate of ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased	
7 MARÍA FERNANDA INIESTRA-MEJÍA, as HEIR to the Decedent,	\$30
8 ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased	
9 BLANCA JANET MEJÍA-SÁNCHEZ, as HEIR to the Decedent,	\$30
10 ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased	
11 PEDRO GABRIEL INIESTRA-GALLARDO, as HEIR to the Decedent,	\$30
12 ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased	
13 CHRISTOPHER G. MEHNE, as Personal Representative of the	\$30
14 Estate of LUIS OCTAVIO REYES-DOMÍNGUEZ, deceased	
15 ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent,	\$30
16 LUIS OCTAVIO REYES-DOMÍNGUEZ, deceased	
17 SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent,	\$30
18 LUIS OCTAVIO REYES-DOMÍNGUEZ	
19 VICTORIA REYES-CISNEROS, as HEIR to the Decedent,	\$30
20 LUIS OCTAVIO REYES-DOMÍNGUEZ, deceased	
21 CHRISTOPHER G. MEHNE, as Personal Representative of the	\$30
22 Estate of LOYDA LILIANA LUNA-LORROSA, deceased	
23 MARÍA DEL PILAR LARROSA-DELGADO, as HEIR to the Decedent,	\$30

1 LOYDA LILIANA LUNA-LARROSA, deceased
2 CHRISTOPHER G. MEHNE, as Personal Representative of the \$30
3 Estate of JADE PAOLA REYES-LUNA, deceased
4 ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent, \$30
5 JADE PAOLA REYES-LUNA, deceased
6 SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent, \$30
7 JADE PAOLA REYES-LUNA, deceased
8 VICTORIA REYES-CISNEROS, as HEIR to the Decedent, \$30
9 JADE PAOLA REYES-LUNA, deceased
10 ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent, \$30
11 Estate of GUILLERMO OCTAVIO REYES-LUNA, deceased
12 ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent, \$30
13 GUILLERMO OCTAVIO REYES-LUNA, deceased
14 SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent, \$30
15 GUILLERMO OCTAVIO REYES-LUNA, deceased
16 VICTORIA REYES-CISNEROS, as HEIR to the Decedent, \$30
17 GUILLERMO OCTAVIO REYES-LUNA, deceased
18 CHRISTOPHER G. MEHNE, as Personal Representative of the \$30
19 Estate of FRIDA ALEJANDRINA REYES-LUNA, deceased
20 ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent, \$30
21 FRIDA ALEJANDRINA REYES-LUNA, deceased
22 SARA ALEJANDRA REYES-LUNA, as HEIR to the Decedent, \$30
23 FRIDA ALEJANDRINA REYES-LUNA, deceased

1 VICTORIA REYES-CISNEROS, as HEIR to the Decedent,

\$30

2 FRIDA ALEJANDRINA REYES-LUNA, deceased

3 Total fees to be listed on first page of form (Line 23)

810.00

EXHIBIT “C”

EXHIBIT “C”

REGISTER OF ACTIONS**CASE NO. A-21-833999-C****Estate of Manuel Alejandro Sepulveda-Gonzalez, Plaintiff(s) vs. TVPX Aircraft Solutions Inc, Defendant(s)**§
§
§
§
§
§Case Type: Negligence - Other Negligence
Date Filed: 05/04/2021
Location: Department 29
Cross-Reference Case Number: A833999

PARTY INFORMATION

		Lead Attorneys
Defendant	Atlantic Aviation FBO Inc	
Defendant	Caldera, Nabor Bonilla	
Defendant	Compania De Aviacion y Logistica Empresarial de CV	
Defendant	TVPX 2017 MSN 5043 Business Trust	
Defendant	TVPX Aircraft Solutions Inc	
Plaintiff	Estate Jade Paola Reyes-Luna	William H. Brown <i>Retained</i> 702-816-2200(W)
Plaintiff	Estate of Adriana Monserrat Mejia-Sancez	William H. Brown <i>Retained</i> 702-816-2200(W)
Plaintiff	Estate of Frida Alejandrea Reyes-Luna	William H. Brown <i>Retained</i> 702-816-2200(W)
Plaintiff	Estate of Guillermo Octavio Reyes-Luna	William H. Brown <i>Retained</i> 702-816-2200(W)
Plaintiff	Estate of Loyda Liliana Luna-Lorrosa	William H. Brown <i>Retained</i> 702-816-2200(W)
Plaintiff	Estate of Luis Octavio Reyes-Dominguez	William H. Brown <i>Retained</i> 702-816-2200(W)
Plaintiff	Estate of Manuel Alejandro Sepulveda-Gonzalez	William H. Brown <i>Retained</i> 702-816-2200(W)
Plaintiff	Estate of Monica Leticia Salinas-Trevino	William H. Brown <i>Retained</i> 702-816-2200(W)
Plaintiff	Gonzalez -Gomez, Ana Maria	William H. Brown <i>Retained</i> 702-816-2200(W)
Plaintiff	Iniestra-Gallardo, Pedro Gabriel	William H. Brown <i>Retained</i> 702-816-2200(W)

Plaintiff	Iniesta-Mejia, Maria Fernanda	William H. Brown <i>Retained</i> 702-816-2200(W)
Plaintiff	Larraso-Delgado, Maria Del Pilar	William H. Brown <i>Retained</i> 702-816-2200(W)
Plaintiff	Mejia-Sanchez, Blanca Janed	William H. Brown <i>Retained</i> 702-816-2200(W)
Plaintiff	Reyes--Cisneros, Alyanna Carolina	William H. Brown <i>Retained</i> 702-816-2200(W)
Plaintiff	Reyes-Cisneros, Victoria	William H. Brown <i>Retained</i> 702-816-2200(W)
Plaintiff	Reyes-Luna, Sara Alejandra	William H. Brown <i>Retained</i> 702-816-2200(W)
Plaintiff	Salinas Almaguer, Juan Jose	William H. Brown <i>Retained</i> 702-816-2200(W)
Plaintiff	Sepluveda-Cruz, Manuel	William H. Brown <i>Retained</i> 702-816-2200(W)
Plaintiff	Trevino-Villareal, Leticia Guadalupe	William H. Brown <i>Retained</i> 702-816-2200(W)

EVENTS & ORDERS OF THE COURT

	OTHER EVENTS AND HEARINGS
05/04/2021	Complaint With Jury Demand <i>Complaint Plaintiffs Demand Trial by Jury</i>
05/04/2021	Initial Appearance Fee Disclosure <i>Initial Appearance Fee Disclosure</i>
05/04/2021	Summons Electronically Issued - Service Pending <i>Summons</i>
05/26/2021	Affidavit of Service <i>Affidavit of Service</i>
05/26/2021	Affidavit of Service <i>Affidavit of Service (TVPX 2017 MSN 5043 Business Trust)</i>
05/26/2021	Affidavit of Service <i>Affidavit of Service</i>

FINANCIAL INFORMATION

Plaintiff	Estate of Manuel Alejandro Sepulveda-Gonzalez	
	Total Financial Assessment	1,350.00
	Total Payments and Credits	1,350.00
	Balance Due as of 06/03/2021	0.00
05/04/2021	Transaction Assessment	1,350.00
05/04/2021	Efile Payment	Receipt # 2021-27481-CCCLK Estate of MANUEL ALEJANDRO SEP LVEDA-GONZ LEZ, deceased (1,350.00)

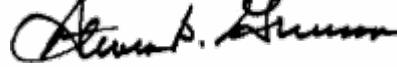
EXHIBIT “D”

EXHIBIT “D”

AOS

**DISTRICT COURT , CLARK COUNTY
CLARK COUNTY, NEVADA**

Electronically Filed
5/26/2021 8:14 AM
Steven D. Grierson
CLERK OF THE COURT


MEHNE, ET AL.**Plaintiff****vs****TVPX AIRCRAFT SOLUTIONS, INC.****Defendant****CASE NO: A-21-833999-C****HEARING DATE/TIME:****DEPT NO: 29**

AFFIDAVIT OF SERVICE

ARANZA AGUILAR being duly sworn says: That at all times herein affiant was and is a citizen of the United States, over 18 years of age, not a party to or interested in the proceedings in which this affidavit is made. That affiant received 1 copy(ies) of the SUMMONS, COMPLAINT, on the 11th day of May, 2021 and served the same on the 13th day of May, 2021, at 14:35 by:

serving the servee ATLANTIC AVIATION FBO, INC. C/O REGISTERED AGENT CT CORPORATION SYSTEM by personally delivering and leaving a copy at (address) 701 S. CARSON ST., SUITE 200, CARSON CITY NV 89701 with DANIELLE NAKI, CLERK pursuant to NRS 14,020 as a person of suitable age and discretion at the above address, which address is the address of the resident agent as shown on the current certificate of designation filed with the Secretary of State.

Pursuant to NRS 53.045

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

EXECUTED this 13 day of May, 2021.

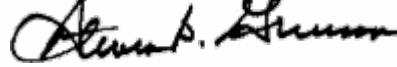


**ARANZA AGUILAR
R-095409**

AOS

**DISTRICT COURT , CLARK COUNTY
CLARK COUNTY, NEVADA**

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CLERK OF THE COURT


MEHNE, ET AL.**Plaintiff****vs****TVPX AIRCRAFT SOLUTIONS, INC.****Defendant****CASE NO: A-21-833999-C****HEARING DATE/TIME:****DEPT NO: 29**

AFFIDAVIT OF SERVICE

OUT OF TOWN being duly sworn says: That at all times herein affiant was and is a citizen of the United States, over 18 years of age, not a party to or interested in the proceedings in which this affidavit is made. That affiant received 1 copy(ies) of the SUMMONS, COMPLAINT, on the 11th day of May, 2021 and served the same on the 17th day of May, 2021, at 11:48 by:

serving the servee TVPX AIRCRAFT SOLUTIONS, INC. â„... REGISTERED AGENT BRETT KING by personally delivering and leaving a copy at (address) 39 E. EAGLE RIDGE DR., SUITE 201, NORTH SALT LAKE UTAH 84054 with BRETT KING, AUTHORIZED TO ACCEPT pursuant to NRS 14,020 as a person of suitable age and discretion at the above address, which address is the address of the resident agent as shown on the current certificate of designation filed with the Secretary of State.

Pursuant to NRS 53.045

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

EXECUTED this 17 day of May, 2021.

**NOT FINAL
AFFIDAVIT
OUT OF TOWN**

AOS

**DISTRICT COURT , CLARK COUNTY
CLARK COUNTY, NEVADA**

MEHNE, ET AL.**Plaintiff****vs****TVPX AIRCRAFT SOLUTIONS, INC. ET AL.** Defendant**CASE NO: A-21-833999-C****HEARING DATE/TIME:****DEPT NO: 29**

AFFIDAVIT OF SERVICE

OUT OF TOWN being duly sworn says: That at all times herein affiant was and is a citizen of the United States, over 18 years of age, not a party to or interested in the proceedings in which this affidavit is made. That affiant received 1 copy(ies) of the SUMMONS, COMPLAINT, on the 11th day of May, 2021 and served the same on the 17th day of May, 2021, at 11:48 by:

serving the servee TVPX 2017 MSN 5043 BUSINESS C/O REGISTERED AGENT TVPX AIRCRAFT SOLUTIONS, INC. by personally delivering and leaving a copy at (address) 39 E. EAGLE RIDGE DR., SUITE 201, NORTH SALT LAKE UTAH 84054 with BRETT KING, AUTHORIZED TO ACCEPT pursuant to NRS 14,020 as a person of suitable age and discretion at the above address, which address is the address of the resident agent as shown on the current certificate of designation filed with the Secretary of State.

Pursuant to NRS 53.045

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

EXECUTED this 17 day of May, 2021.

**NOT FINAL
AFFIDAVIT
OUT OF TOWN**

EXHIBIT “E”

EXHIBIT “E”

NRE
PHILIP M. HYMANSON, ESQ.
Nevada State Bar No. 2253
HENRY JOSEPH HYMANSON, ESQ.
Nevada State Bar No. 14381
HYMANSON & HYMANSON
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Las Vegas, NV 89148
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*Attorneys for Defendants TVPX Aircraft Solutions, Inc.
and TVPX 2017 MSN 5043 Business Trust*

DISTRICT COURT

CLARK COUNTY, NEVADA

CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ, deceased; ANA MARÍA GONZÁLEZ-GÓMEZ, as HEIR to the Decedent, MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ, deceased; MANUEL SEPÚLVEDA-CRUZ, as HEIR to the Decedent, MANUEL ALEJANDRO SEPÚLVEDA-GONZÁLEZ, deceased; CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of MÓNICA LETICIA SALINAS-TREVIÑO, deceased; JUAN JOSÉ SALINAS ALMAGUER, as HEIR to the Decedent, MÓNICA LETICIA SALINAS-TREVIÑO, deceased; LETICIA GUADALUPE TREVIÑO VILLAREAL, as HEIR to the Decedent, MÓNICA LETICIA SALINAS-TREVIÑO, deceased; CHRISTOPHER G. MEHNE, as Personal Representative to the Estate of ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; MARÍA FERNANDA INIESTRA-MEJÍA, as HEIR to the Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; BLANCA JANET MEJÍA-SÁNCHEZ, as HEIR to the Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; PEDRO GABRIEL INIESTRA-GALLARDO, as HEIR to the Decedent, ADRIANA MONSERRAT MEJÍA-SÁNCHEZ, deceased; CHRISTOPHER G. MEHNE, as Personal Representative of the Estate of LUIS OCTAVIO REYES-DOMÍNGUEZ, deceased; ALYANNA CAROLINA REYES-CISNEROS, as HEIR to the Decedent, LUIS

CASE NO.: A-21-833999-C
DEPT. NO.: 29

NOTICE OF REMOVAL

1 OCTAVIO REYES-DOMÍNGUEZ, deceased;
2 SARA ALEJANDRA REYES-LUNA, as HEIR to
the Decedent, LUIS OCTAVIO REYES-
DOMÍNGUEZ, deceased; VICTORIA REYES-
CISNEROS, as HEIR to the Decedent, LUIS
OCTAVIO REYES-DOMÍNGUEZ, deceased;
4 CHRISTOPHER G. MEHNE, as Personal
Representative of the Estate of LOYDA LILIANA
5 LUNA-LARROSA, deceased; MARÍA DEL
PILAR LARROSA-DELGADO, as HEIR to the
6 Decedent, LOYDA LILIANA LUNA-LARROSA,
deceased; CHRISTOPHER G. MEHNE, as
7 Personal Representative of the Estate of JADE
PAOLA-REYES-LUNA, deceased; ALYANNA
8 CAROLINA REYES-CISNEROS, as HEIR to the
Decedent, JADE PAOLA REYES-LUNA,
9 deceased; SARA ALEJANDRA REYES-LUNA, as
HEIR to the Decedent, JADE PAOLA REYES-
LUNA, deceased; VICTORIA REYES-
10 CISNEROS, as HEIR to the Decedent, JADE
PAOLA REYES-LUNA, deceased;
11 CHRISTOPHER G. MEHNE, as Personal
Representative of the Estate of GUILLERMO
12 OCTAVIO REYES-LUNA, deceased; ALYANNA
CAROLINA REYES-CISNEROS, as HEIR to the
13 Decedent GUILLERMO OCTAVIO REYES-
LUNA, deceased; SARA ALEJANDRA REYES-
14 LUNA, as HEIR to the Decedent, GUILLERMO
OCTAVIO REYES-LUNA, deceased; VICTORIA
15 REYES-CISNEROS, as HEIR to the Decedent,
GUILLERMO OCTAVIO REYES-LUNA,
deceased; and CHRISTOPHER G. MEHNE, as
16 Personal Representative of the Estate of FRIDA
ALEJANDRINA REYES-LUNA, deceased;
17 ALYANNA CAROLINA REYES-CISNEROS, as
HEIR to the Decedent, FRIDA ALEJANDRINA
REYES-LUNA, deceased; SARA ALEJANDRA
18 REYES-LUNA, as HEIR to the Decedent, FRIDA
ALEJANDRINA REYES-LUNA, deceased;
VICTORIA REYES-CISNEROS, as HEIR to the
20 Decedent, FRIDA ALEJANDRINA REYES-
LUNA;
21 Plaintiffs,

22 v.

23
24 TVPX AIRCRAFT SOLUTIONS, INC.;
COMPAÑÍA DE AVIACIÓN Y LOGISTICA
25 EMPRESARIAL S.A. DE C.V.; TVPX 2017 MSN
5043 BUSINESS TRUST; ATLANTIC
26 AVIATION FBO, INC., and NABOR BONILLA
CALDERA,

27 Defendants.
28

TO: Clerk of the Court for the Eighth Judicial District Court
AND TO: PLAINTIFFS and their attorneys, William H. Brown, Esq., Donald J. Nolan, Esq., Thomas P. Routh, Esq., Windle Turley, Esq., and Lacey Turley Most, Esq.

Please take notice that Defendants TVPX AIRCRAFT SOLUTIONS, INC., TVPX 2017
MSN 5043 BUSINESS TRUST, and ATLANTIC AVIATION FBO, INC. (collectively
“Defendants”) have removed this action to the United States District Court for the District of
Nevada pursuant to 28 U.S.C. § 1441 and 28 U.S.C. § 1332. A copy of the Notice of Removal
filed in the United States District Court for the District of Nevada is attached.

DATED this 4th day of June, 2021.

HYMANSON & HYMANSON

BY: /s/ Philip M. Hymanson
PHILIP M. HYMANSON, ESQ.
Nevada State Bar No. 2253
HENRY JOSEPH HYMANSON, ESQ.
Nevada State Bar No. 14381
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Phil@HymansonLawNV.com
Hank@HymansonLawNV.com

Attorneys for Defendants TVPX Aircraft Solutions, Inc. and TVPX 2017 MSN 5043 Business Trust

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of HYMANSON & HYMANSON, and pursuant to NRCP 5(b), EDCR 8.05, Administrative Order 14-2, and NEFCR 9, I caused a true and correct copy of the foregoing **NOTICE OF REMOVAL** to be served via the Court's Electronic Filing System on the 4th day of June, 2021 upon those persons designated by the parties in the E-Service Master List for the above-referenced matter in the Eighth Judicial District Court e-Filing System in accordance with the mandatory electronic service requirements of Administrative Order 14-2 and the Nevada Electronic Filing and Conversion Rules.

/s/ Karen Wiehl
An Employee of HYMANSON & HYMANSON

HYMANSON & HYMANSON
8816 Spanish Ridge Avenue
Las Vegas, NV 89148
702-629-3300